**U. S. Department of the Interior**
**Calendar Year 2002 Progress Report**
**on the Implementation of Executive Order 13148**
**"Greening the Government Through Leadership in Environmental Management"**

## EXECUTIVE SUMMARY

The DOI consists of many bureaus and offices with different missions that serve a diverse customer and public base. However, as a Department, we reflect a citizen-focused vision for effective stewardship that is centered on the *"4C's" – consultation, cooperation, and communication, all in the service of conservation."* Within DOI, managing the environment is a critical component of our mission of being good stewards of our Nation's natural and cultural resources. Collectively, DOI manages 507 million acres of public lands (e.g., national parks, wildlife refuges, etc.), about 1.7 billion acres of the Outer Continental Shelf, and 56 million acres of land held in trust for American Indian tribes and individuals. DOI supplies 17% of America's hydropower, 28% of the Nation's domestic energy production and manages nearly 900 dams and reservoirs.

In keeping with our citizen-focused stewardship role, Secretary of the Interior Norton is committed to DOI-wide environmental compliance and EMS implementation. Furthermore, sound management practices are the keys to success, and lead to more efficient and effective government practices in support of the President's Management Agenda. The DOI's progress report reflects both our stewardship role and support of the President's Management Agenda. Furthermore, our bureaus and offices have incorporated many innovative practices to implement their respective EMS programs and other requirements under E.O. 13148. A brief synopsis of bureau and office activities is presented below.

**Office of Environmental Policy and Compliance (OEPC):** The OEPC coordinated the development of DOI's EMS policy (515 DM 4, "Environmental Management Systems") issued on October 2, 2002. Also, OEPC chairs the DOI EMS Council and continues to coordinate E.O. 13148 activities and EMS implementation to ensure that environmental accountability is integrated into agency day-to-day activities and long-term planning. DOI has already implemented many of the 2002 EMS scorecard criteria developed by the Interagency Environmental Leadership Workgroup, which are as follows: (1) formal EMS policy signed, (2) appropriate facilities identified, (3) EMS resources identified, (4) EMS implementation guidance identified, (5) senior management training provided or planned, and (6) compliance audit program implemented. OEPC is sponsoring the 2003 DOI Conference on the Environment in Phoenix, Arizona that will have a heavy emphasis on EMS including training and technical sessions. The OEPC prepares an Annual Report on Bureau Environmental Auditing Programs and Activities. Summary reports were completed for Fiscal Years (FY) 1999, 2000, 2001, and 2002. The OEPC provides the bureaus with the Federal environmental protocols developed by the U.S. Army Construction Engineering Research Laboratories. Finally, the OEPC administers the DOI Environmental Achievement Award.

**National Business Center (NBC):** The NBC has implemented the following environmental policies, strategies and plans at the Interior Complex (Main and South Interior Buildings):

Recycling Program and Guide; Purchase, Installation, and Disposal of Carpet Policy; Spring Clean-Up; Modernization Move-Out and Office Spruce Up; Computer Recycling Program; Green Office Supplies at the Office Eagle Store in the MIB; and Waste Diversion Rate of 43%. NBC requires custodial contractors to use environmentally friendly custodial products that provide a safer and healthier workplace in the Interior Complex. There is a restriction on the purchase and use of aerosol dispensers and substituted items that use pump-spray applicators in the Interior Complex. NBC requires the use of use of bio-based plates and bowls and napkins manufactured without the use of elemental chlorine for dying and bleaching in the Main Interior cafeteria. Also, NBC has replaced chillers in the Interior Complex for reduction of ozone depleting substances. Finally, the NBC coordinated recycling and demanufacturing service for excess obsolete and unserviceable electronic equipment.

**Office of Acquisition and Property Management (PAM): The** DOI Acquisition Policy Release (DIAPR) 93-18, issued by PAM, calls for taking action to minimize the procurement of ozone-depleting substances. PAM issued other policies relating to ozone-depleting substances.

**Bureau of Indian Affairs (BIA):** An EMS gap analysis was conducted at BIA Headquarters in 2001. As a result of the gap analysis, an EMS protocol was integrated into the BIA Environmental Management Audit Program (EMAP) - a BIA-wide program currently underway. In 2002, BIA conducted internal auditors training and pilot environmental audits at two BIA agencies involving approximately a dozen facilities to test the EMAP protocols and procedures. In addition, between 1999 and 2000, multimedia environmental reviews were conducted by the USEPA through a Memorandum of Agreement at four BIA agencies. Audits at 10 agencies including more that 20 locations are planned for CY 2003. These pilots are being used to identify, develop and test tools necessary to implement field-level EMSs BIA-wide. Additional assessments are planned in conjunction with environmental audits in 2003 at select facilities. A policy specifically addressing EMS is expected by summer of 2003.

**Bureau of Land Management (BLM):** A formal BLM EMS policy is currently being developed. However, the BLM has already adopted a number of EMS elements. For example, BLM's Compliance Assessment Safety, Health, and Environment (CASHE) Program incorporates many EMS elements. Baseline CASHE audits have been completed at every field office and major facilities in BLM and follow-up CASHE audits are currently conducted on a three-year cycle. Also, BLM offers in-house environmental compliance and hazardous materials management training for technical specialists and managers. One course in particular, *Managers Guide to Environmental Compliance and Pollution Prevention*, prepares managers to fulfill their legal responsibilities for environmental compliance and protection.

**Bureau of Reclamation (BOR):** The BOR has a broad spectrum of operations at its facilities that include dams, power generation and irrigation systems. The BOR established and implemented environmental compliance audit programs and policies that emphasize compliance and pollution prevention. The BOR's Lower Colorado Region is currently reviewing two EMS standards that might be implemented based on the standards of ISO14001 and the Code of

Environmental Principles. Many parts of an EMS are already in place throughout BOR, and offices are being looked at for potential pilot implementation. Directive and Standard ENV 02-08 (audit processes) is in the process of being revised to support EMS and separate Directives and Standards (D&S) will be developed to specifically address BOR EMS implementation. The BOR has D&S ENV 02-08 that addresses the BOR compliance audit program. It has been in place since 1996 and gives audit protocol and guidance. The program provides for conducting baseline audits of all BOR facilities.

**Fish and Wildlife Service (FWS):** The FWS Director's Order No. 144, Greening the Service through Environmental Leadership was established May 7, 2002. Section 7 (a)(3) directed the FWS to implement an EMS. In addition, a Director's memo dated February 4, 2003, established the FWS Environmental Management Commitment. The FWS EMS implementation strategy focused on the development of an EMS at the field station level where FWS activities have the most direct and immediate impact on the environment. The FWS recognized that EMS benefits could be realized at all field stations, regardless of size and complexity, but that EMS development will focus on field stations that are larger and more complex and have the *greatest* environmental aspects and impacts. The FWS has selected 70 appropriate facilities and will implement EMS over a three-year period (FYs 2003-2005) to meet the deadline of December 31, 2005. During the first quarter of fiscal year 2002, the FWS completed Environmental Management Reviews in four of its regions including various field stations. In 2003, refuge complexes (multi-refuge systems) and large fish hatcheries were targeted. Also, the FWS initiated its environmental compliance auditing program in 1994, and has assisted other bureaus in setting up compliance auditing programs.

**National Park Service (NPS):** The NPS is addressing EO goals in several ways: pilot EMS program, reducing toxic chemicals and ozone depleting substances, conducting environmental audits and developing green procurement guidance. The NPS is developing guidance documents (EnviroFact Sheets and a generic Pollution Prevention plan) to assist parks in reducing and managing toxic chemicals. A Director's Order on EMS has been prepared and is currently undergoing review. A Model EMS guidance document and an EMS Toolkit to assist with EMS implementation at the park level was developed by the NPS EMS Task Group. Seven pilot parks were selected and received EMS training in early 2003. Information gained from the pilot park process will provide insight for NPS-wide rollout to all parks in 2004. To provide additional support, NPS will offer a Help Desk/hotline and EMS web site to assist parks as they develop their EMS, once the program is rolled-out in CY 2004. The NPS Concessions Program has developed concessioner specific Model Environmental Management Plans and integrated EMS into concessioner selection and performance evaluation. NPS completed baseline environmental audits for its parks in October 2002 and will conduct routine (i.e., follow-up) audits for every park every three to five years. The NPS also audits its concession operations.

**Office of Surface Mining (OSM):** Although OSM does not own, operate, or maintain facilities subject to the requirements of E.O. 13148; OSM supports DOI efforts to develop sound EMS's. OSM is preparing an EMS Commitment Policy conveying overall EMS goals and priorities to

senior management. Also, OSM actively promotes environmentally friendly practices under other "Greening" executive orders, including those governing procurement, recycling and waste prevention activities.

**U.S. Geological Survey (USGS):** USGS EMS requirements, and implementation guidance are incorporated into USGS environmental policy manual, SM 445-1-H Environmental Management and Compliance Program Requirements Handbook. In an effort to standardize and simplify the compliance auditing and management review process at all organizational levels, the USGS has entered into a joint effort with the U.S. Army CERL to develop a web-based tracking and auditing assistance program. Web-Based Compliance Assessment System (WEBCASS) is a unique program that enables personnel at all levels to access the tools necessary to comply with environmental compliance requirements, track compliance progress, generate compliance and management reports, and assist with tracking actual and projected corrective action funding. This system is a critical component of the USGS EMS. The USGS funded EMS pilot programs for one facility per region for EMS gap analysis to assess environmental challenges along with facility environmental training and implementation.

The following CY 2002 DOI report is presented in two parts: (1) the progress of Departmental offices, principally the Office of Environmental Policy and Compliance, Office of Acquisition and Property Management, and the National Business Center; and (2) the progress of Departmental bureaus (e.g., Bureau of Indian Affairs). The Appendix contains copies of the DOI EMS Policy (515 DM 4), the DOI EMS Council Charter (ECM03-02), and a list of DOI EMS Council Bureau and Office Contacts. Additional bureau and office program information (e.g., policies, procedures, etc.) were excluded in order to make this report manageable. This additional information may be obtained from the DOI EMS Council Bureau and Office Contact listed.

## PROGRESS OF DEPARTMENTAL OFFICES – E.O. 13148 IMPLEMENTATION

## OFFICE OF ENVIRONMENTAL POLICY AND COMPLIANCE

The Office of Environmental Policy and Compliance (OEPC) develops policy and coordinates and oversees Department-wide compliance with a wide variety of environmental statutes, executive orders, and regulations. The OEPC also provides National and Regional leadership, guidance, and technical assistance to bureaus in complying with these authorities.

The following information describes OEPC activities relating to E.O. 13148, and corresponds to the 2002 EMS scorecard criteria developed by the Interagency Environmental Leadership Workgroup.

Agency EMS Policy.

The DOI has consistently worked with both the U.S. Environmental Protection Agency (EPA) and the White House Office of the Federal Environmental Executive (OFEE) in promoting EMS. The OEPC consistently represents the DOI on the Interagency Environmental Leadership Workgroup established by E. O. 13148, to implement the requirements of the Executive Order throughout the Federal community. The DOI was a signatory charter member in 1996 supporting the Code of Environmental Management Principles that established management principles for Federal agencies to move towards responsible environmental performance. In cooperation with the bureaus, the OEPC sponsored a 2-day EMS Workshop on May 29-30, 2002, to facilitate discussion of EMS issues faced by the bureaus in meeting the requirements of E.O. 13148 and to direct bureau involvement in the formulation of a Department-wide EMS program. The Assistant Secretary –Policy, Management and Budget, attended the Workshop. The product of this Workshop was a finalized draft of DOI's EMS policy.

On October 2, 2002, DOI issued its EMS policy, as 515 DM 4, entitled "Environmental Management Systems." This policy provides a framework for establishing EMS and requires that all DOI bureaus and offices establish EMS's for all lands, facilities, operations, and services subject to federal, state, and local environmental requirements. EMS's are required at appropriate facilities based on facility size, complexity, and if operations affect the environment. As such, concessioners, contractors, permittees, and other parties operating on DOI lands are subject to the EMS policy. However, the policy is meant to be flexible to allow bureaus to select the EMS model that may be best suited for it (e.g., ISO 14001, CEMP, etc.). The EMS policy requires all bureaus and offices to have an EMS directive or policy in place by December 31, 2003, and to have an EMS implemented in all appropriate facilities by December 31, 2005.

DOI's EMS policy was formally transmitted to all bureaus and offices upon its release. In addition, the OEPC did a feature article on the EMS policy in the January 2003 issue of the DOI employee newsletter, *People, Land & Water*. DOI's EMS policy is publicly available on DOI's website at http://elips.doi.gov/elips/release/3534.htm.

Identification of "appropriate facilities" for EMS implementation.

DOI's EMS policy uses the term "applicable Departmental lands, facilities, operations, and services. This term is used for those DOI lands, facilities, operations, and services that exhibit environmental effects based upon identification of environmental aspects and impacts including those of third parties. Opportunities to identify and enhance EMS implementation at both the facility level and at higher organizational levels (e.g., districts, regions, etc.) are strongly encouraged.

Currently, DOI has seven facilities (4- Fish and Wildlife Service and 3- National Park Service) on the list of U.S. Federal Government Facilities Actively Implementing EMS.

Fish and Wildlife Service

Charles M. Russell National Wildlife Refuge (NWR), MT
E.B. Forsyth NWR, NJ
J.N. Ding Darling NWR, FL
Leavenworth National Fish Hatchery, WA

National Park Service

Grand Canyon National Park, AZ
Dinosaur National Monument, UT
Blue Ridge Parkway, NC

Identification of resources (e.g., dollars, staff) for EMS implementation and for increase in budget.

Section 4.8 (E) in DOI's EMS policy requires Heads of bureaus and offices to ensure that adequate resources and funding are available for EMS implementation. Section 4.8 (F) requires that program managers (e.g., area/field office managers, district managers, refuge managers, park superintendents) must ensure EMS implementation and to request such funding through their respective bureau budget process.

The Budget Fact Sheet on EMS that was developed by the Interagency EMS Subgroup was distributed to both program and budget offices. The OEPC in coordination with DOI's Office of Budget developed criteria for DOI's FY 2004 and FY 2005 Budget Formulation Guidance for bureaus to request funding specifically for EMS implementation.

Guidance for implementing EMS at your agency.

To assist in DOI-wide EMS implementation, a DOI EMS Council was established under the provisions of 515 DM 4 and formally chartered under Environmental Compliance Memorandum

(ECM) 03-02. The ECM is publicly available at http://www.oepc.gov/ecms.html.

The DOI EMS Council makes recommendations to senior DOI management on EMS implementation and provides a forum to raise EMS crosscutting issues that affect bureaus and offices. Furthermore, the DOI EMS Council promotes common efficiencies and sharing of resources in order to foster environmental stewardship throughout DOI.

The OEPC represents DOI on the Interagency EMS Subgroup that has either developed or transmitted many EMS implementation resources. In turn, OEPC has transmitted these resources to our bureaus and offices. Also, many EMS implementation resources are now available on the Greening the DOI website at: http://www.doi.gov/greening.

EMS training for senior-level managers.

The DOI Conferences on the Environment have been very successful as a means to exchange technical information on various environmental procedures and requirements to DOI bureaus and offices. It is the only Department-wide environmental conference available where representation of DOI leadership is visible and that offers both staff and senior level management opportunities to receive technical information and training in a variety of environmental areas. The OEPC sponsors such conferences along with a bureau host. These conferences took place in 1993, 1994, 1995, 1999, and 2001. Our 2003 conference that was held in Phoenix, Arizona featured technical presentations and training in many environmental areas, including EMS.

The 2003 DOI Conference on the Environment was sponsored by OEPC and hosted by the Fish and Wildlife Service. There was a heavy emphasis on environmental compliance and environmental management systems (EMS) through plenary, poster, panel sessions and paper presentations. In addition, training in various environmental areas, including EMS was offered. Both EPA headquarters and regional personnel and representatives from the Office of the Environmental Executive assisted in presenting many of these training and technical sessions.

Secretary Norton addressed conference attendees through videotape during the Conference Opening Plenary Session. Both environmental compliance and EMS implementation were key primary features addressed in her speech. Ms. Nina Rose Hatfield, Deputy Assistant Secretary – Budget and Finance addressed environmental liability issues. Mr. James Connaughton, Chair, Council on Environmental Quality was the principal Opening Plenary Session speaker and addressed conference attendees on EMS and other environmental issues.

The Conference Capstone Plenary Session was an interactive panel dialogue on current EMS implementation issues that included questions and answers from the audience. It featured Mr. John Howard, Federal Environmental Executive and Mr. Jay Benforado, Director; EPA National Center for Environmental Innovation along with Ms. Suellen Keiner of the National Academy of Public Administration. Ms. Karen Wade, Director of the National Park Service Intermountain Region moderated the Capstone Plenary Session.

Program to conduct environmental compliance audits.

Secretary Norton has repeatedly emphasized that compliance with environmental laws and regulations remains a high priority for the Department. DOI policy requires environmental auditing of all its facilities (Departmental Manual, Part 515, Chapter 2, "Environmental Auditing." It is publicly available at http://elips.doi.gov/elips/release/3172.htm. Each bureau is responsible for developing and implementing its respective environmental auditing program. The OEPC provides the bureaus with the Federal environmental protocols developed by the U.S. Army Construction Engineering Research Laboratories called the Environmental Assessment Management (TEAM) Guide. The TEAM Guide is available to bureaus on the OEPC website for use by the bureaus and has been updated on a quarterly basis.

As part of DOI's annual audit summary reporting requirement, the bureaus provide information concerning their environmental auditing programs to OEPC. Such information includes the cumulative number of facilities audited to date, number of facility audits scheduled for the next fiscal year, major audit issues identified in the reporting year, and the total cost of the bureau audit program for the reporting fiscal year. The DOI expects that the base number of facilities will continue to change over the years, which affects both projections and reported outcomes. As part of DOI's annual audit reporting requirement, bureaus provide summary information on their auditing programs and activities to OEPC. The OEPC then prepares a DOI Summary of the Fiscal Year Annual Report on Bureau Environmental Auditing Programs and Activities. Summary reports were completed for Fiscal Years (FY) 1999, 2000, 2001, and 2002.

For FY 2002, a total of 416 facilities were audited resulting in a cumulative total of 2,092 facilities audited to date. Bureaus reported an estimated 491 facility audits are scheduled for FY 2003. For the Department as a whole, it appears that bureaus are making progress in their environmental auditing programs.

The OEPC also developed criteria in DOI's FY 2004 and FY 2005 Budget Formulation Guidance that provides funding request guidance to bureaus for corrective actions as a result of environmental audit findings at facilities. Findings and corrective action are part of the individual bureau auditing and EMS programs (see bureau program descriptions).

Other OEPC Activities: DOI Environmental Achievement Award.

The OEPC administers the DOI Environmental Achievement Award. This Award recognizes exceptional environmental achievements that highlight conservation of resources through cooperation, consultation and communication within bureaus or offices, either by individual employees or teams, or by contractors to a bureau or office. The Award follows the intent of the following: DOI policy for comprehensive waste management for its lands and facilities (518 DM 1); Executive Order (E.O.) 12856, Federal Compliance With Right-To-Know Laws and Pollution Prevention Requirements; E.O.13101, Greening the Government Through Waste

Prevention, Recycling, and Federal Acquisition; and E.O. 13148, Greening the Government Through Leadership in Environmental Management, and the Strategic Plan for Greening the Department of the Interior Through Waste Prevention, Recycling, and Federal Acquisition. Areas of recognition include:

- Waste/pollution prevention
- Recycling
- Environmentally preferable and affirmative procurement
- Facility environmental excellence
- Environmental management systems
- Environmental stewardship
- Education and outreach.

Other environmental and conservation improvement initiatives are also considered as well. An Awards Committee consisting of representatives of DOI bureaus and offices review nominations that are submitted and perform the selection of award recipients. In 2002, a total of 14 (4 individual, 7 team, and 3 cooperative) Environmental Achievement Awards were presented. Since the awards inception in 1995, a total of sixty-one recipients have received this award.

**NATIONAL BUSINESS CENTER**

The National Business Center (NBC), Division of Facilities Management Services, provides their E.O. 13148, progress report for the Main and South Interior Buildings (Interior Complex). NBC specific activities relating to E.O. 13148 include the following:

Section 305(b) - Amended or Updated Policies, Strategies, and Plans.

The NBC reports the following environmental policies, strategies and plans that have been implemented at the Interior Complex: Recycling Program and Guide; Purchase, Installation, and Disposal of Carpet Policy; Spring Clean-Up; Modernization Move-Out and Office Spruce Up; Computer Recycling Program; Green Office Supplies at the Office Eagle Store in the MIB; and Waste Diversion Rate of 43%, LEEDs Pilot Project for the modernization of the MIB. In addition, the NBC has requested $100K in the Fiscal Year (FY) 2004 Departmental Budget request to conduct base-line surveys in our facilities.

Section 502 - Reduction Goals for Releases of Toxic Chemicals as Reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.

The following actions were taken by the NBC to reduce the release of toxic chemicals:

a. We require our custodial contractor to use environmentally friendly custodial products that

provide a safer and healthier workplace in the Interior Complex. Chemical cleaning products used under this contract meet or exceed the mandatory criteria for reducing the release of toxic chemicals. Contract specifications include the following: must not be a hazardous waste (for disposal purposes); must not be packaged in an aerosol container, must not contain any suspected or known carcinogens; must not contain any ingredients designated as Chesapeake Bay Watershed Chemicals of Concern; minimizes the use of dyes and fragrances, and minimizes skin, eye, and respiratory irritation. Also, paper products (e.g., toilet paper, paper towels) have to be manufactured without the use of elemental chlorine for dyeing and bleaching.

b. Restricted the purchase and use of aerosol dispensers and substituted items that use pump-spray applicators in the Interior Complex that significantly reduced the material wasted.

c. Required the use of use of bio-based plates and bowls and napkins manufactured without the use of elemental chlorine for dying and bleaching in the MIB cafeteria.

d. On average, the DOI annually replaces about 15,000 computers containing about five pounds of lead each. These no longer used computers can potentially contribute almost 40 tons of lead to landfills nationwide. In 2002, under a pilot program, the NBC sent 60,000 pounds of unserviceable computer equipment including central processing units, monitors, keyboards, printers, and scanners to be recycled. None of this equipment was of any use to schools or other charities and all DOI data on this equipment was first removed. The obsolete electronics were shipped to DMC Electronics Recycling of Hagerstown, MD – an electronic "demanufacturing" firm under contract to the Department of Defense. It is estimated that the NBC's shipment of obsolete electronics diverted two tons of lead, almost five tons of iron, more than three tons of aluminum, and two tons of copper from going to landfills.

Section 505 - Reduction and Management of Use of Ozone Depleting Substances (ODS).

The following actions were taken by the NBC to reduce and manage the use of ODS:

a. The chillers in the Main Interior Building (MIB) are being replaced as part of the building modernization project and will use HFC-134a.

b. The freon in our existing window air conditioners and refrigerators is being recycled before turning the units in for disposal.

c. We are not using any cleaning solvents that contain ODS.

d. The chillers in the South Interior Building (SIB) that contain Class I ODS are on schedule to be replaced in FY2005 by GSA.

e. We no longer have any fire suppression systems that contain an ODS (Halon).

f. We no longer have any fire extinguishers that contain an ODS (Halon).

Section 601. Environmentally and Economically Beneficial Landscape Practices.

The General Services Administration (GSA) has responsibility for the landscape maintenance and design at the Interior Complex, and has issued guidelines to comply with the Presidential Executive Memorandum.

Section 701(b) - Feasibility of Implementing Centralized Procurement and Distribution Programs at its Facilities.

The Acquisition Managers Partnership (Bureau/Office Chiefs) in conjunction with the Office of Acquisition and Property Management (PAM) is looking at the feasibility of various ways streamlining/centralizing the procurement process. The NBC Acquisition Services Division is a centralized contracting operation for all of the NBC except for the Office of Aircraft Services (OAS). This organization was merged into the NBC in FY 2002. The centralization of the OAS contracting shop into the NBC Acquisition Services Division will be looked at in the future. Although not fully centralized, regular meetings of the supervisors of all NBC contracting sites are held at least bimonthly to ensure the procurement process in being handled consistently and to combine purchases when appropriate.

## OFFICE OF ACQUISITION AND PROPERTY MANAGEMENT

Progress in Reducing Ozone Depleting Substances

The Office of Acquisition and Property Management (PAM) issued policy guidance on May 27, 1993, in a DOI Acquisition Policy Release (DIAPR) 93-18 which calls for taking action to minimize the procurement of ozone-depleting substances by:
a. Informing engineering and environmental staffs of Executive Order 12843 requirements;

b. Initiating program review of standards and specifications to remove ozone-depleting substances; and

c. Initiating data collection by program offices on actions taken to prepare for subsequent progress reporting.

On Oct. 24, 1995, a memorandum was issued apprising property managers about the CFC and Halon turn-in program for maintaining reserves of these products by DOD's Defense Logistics Agency. Under DIAPR 97-2, issued December 2, 1996, Interior established policy to maximize the use of alternatives to ozone-depleting substances in specifications and contracts in

accordance with FAR clause requirements. Clauses FAR 52-223.11, "Ozone-Depleting Substances" and FAR 52-223-12, “Refrigeration Equipment and Air Conditioners" are required clauses for inclusion in contract requirements.

Computer Demanufacturing

In 2001, DOI and the Bureau of Prison’s Federal Prison Industries (FPI) signed a Memorandum of Understanding (MOU). The MOU provides recycling and demanufacturing service for DOI’s excess unserviceable and obsolete electronic equipment nationwide. Under this MOU, FPI is charged with dismantling and recycling transferred electronic equipments and components, and removing and disposing of hazardous substances, material and wastes from the equipment, in accordance with Federal, state and local laws and regulations. As was previously described by National Business Center, DOI facilities dispose of electronics in a safe and environmentally sensitive way.

## PROGRESS OF DEPARTMENTAL BUREAUS – E.O. 13148 IMPLEMENTATION

### BUREAU OF INDIAN AFFAIRS

The Bureau of Indian Affairs (BIA) recognizes the importance of environmental management in ensuring the trust responsibility to protect and preserve trust land and trust resources on Indian Lands. In 1998, the Division of Environmental and Cultural Resources Management (DECRM) was established in the Office of Trust Responsibilities. The primary responsibility of DECRM include, but are not limited to, preparing policy guidance and standards for the BIA on environmental compliance, environmental analysis, cultural resources protection, developing curriculum for and providing environmental management training, technical expertise and support to tribal governments for environmental management activities, and serving as a liaison with other federal, state, local and tribal governments regarding environmental management programs. DECRM also manages the distribution of environmental management funds for the BIA. In October 1998, the Indian Affairs Manual, Part 59 Environmental Management (Chapter 3) was revised and includes chapters devoted to policy, requirements, responsibilities, environmental compliance and environmental analysis and review. To provide more direct support in the administration of environmental programs at BIA facilities, Regional Environmental Scientists (RESs) were established at each of the 12 BIA regions in 1992.

Since the promulgation of EO 13148, the BIA has undertaken a number of specific steps to meet the requirements established in the EO and further demonstrate its commitment to environmental stewardship through proactive environmental management. The BIA’s efforts are spearheaded by DECRM, which developed an overall strategy for implementing the EO requirements but also may involve other offices, divisions, and operations at all levels of the organization. While many of the aspects of the BIA’s environmental management strategy have yet to be implemented, the BIA has laid the foundation for continuing to develop a strong EMS program.

An Environmental Management System (EMS) gap analysis was conducted at BIA Headquarters in 2001. This analysis, conducted by DECRM, provided the BIA with valuable information on program gaps that are currently being addressed. A summary report from this analysis is available upon request.

One of the first headquarters tasks was the development of stronger and expanded environmental management policies. The BIA is currently revising the Indian Affairs Manual (IAM) Chapter 59 on environmental management. These revisions will lay out the BIA's specific policies relating to environmental management systems, auditing, compliance, environmental analysis and review, site restoration and others. It is anticipated that the revised IAM chapter will be issued in FY 2004.

In 2001, DECRM conducted a review of existing environmental data management systems. As a result, the BIA is expanding these systems to include a broader range of environmental performance data (e.g., AHERA data, audit program data, environmental liabilities reporting, etc.) and is incorporating relevant information into the BIA's Facility Management Information System (FMIS). Through this process, environmental program data will be integrated into the maintenance backlog system so that it can be more readily addressed and accounted for as part of how the BIA does business.

The DECRM also determined that more work was needed to understand regional and facility-level needs. An EMS protocol is integrated into the BIA Environmental Management Audit Program (EMAP): a BIA-wide program currently underway. Using this protocol as a basis, EMS reviews were conducted at three BIA Agencies. Following these reviews, EMS pilot projects were launched at two of the BIA agencies. These pilots are being used to identify, develop and test tools necessary to implement field-level EMSs BIA-wide.
The responsibilities of the BIA go beyond the management of BIA facilities themselves. In accordance with BIA's trust obligations, BIA has the responsibility for and commitment to assisting Tribes in addressing environmental management issues. Recognizing that Tribes can also benefit from implementing EMS concepts, the BIA – Eastern Region is working cooperatively with the U.S. Environmental Protection Agency, Region 4 and the Eastern Band of Cherokee on a pilot project to develop and implement an EMS for the Tribe. BIA and EPA will share lessons learned from this exercise nationally.

DECRM is in the process of using the experience gained in expanding EMS applications bureau wide. DECRM is coordinating the establishment of a BIA EMS workgroup to truth-check and refine the EMS strategies developed to date. The workgroup is anticipated to have broad representation from throughout the BIA (e.g., Superintendents, Education Line Officers, Facility Managers, etc). The first workgroup meeting is scheduled for the May 2003. The workgroup will meet periodically to provide input on the direction of the BIA EMS program and track its progress.

A BIA environmentally preferable purchasing (EPP) workgroup is also being formed for the purpose of developing and implementing affirmative procurement programs for environmentally preferable materials Bureau-wide. The first meeting is planned in the Summer of 2003. The programs developed through this workgroup will provide an integrated approach to address affirmative procurement mandates under various E.O.'s including 13101, 13123, 13149 and 13148 and will interface with the EMS efforts as appropriate.

BIA Progress Related to Sections of E.O. 13148

Section 502: Status of agency plans to address toxic chemical reduction requirements under Section 313 of EPCRA.

The BIA's use of toxic chemicals and toxic chemical releases are limited. BIA facilities (i.e., agencies) that are required to report requirements under Section 311 (TIER I and II) and Section 313 (Toxic Release Inventory) are minimal.

The BIA EMAP includes protocol on Emergency Planning and Reporting that addresses EPCRA compliance and a protocol on Green Procurement. Potential toxic substance reductions are noted during EMAP audits using these protocols, and best management practices are recommended on a facility-by-facility basis to purchase products with reduced toxicity.

The following strategy is currently planned to further meet this EO requirement:

- In CY 2003, DECRM will conduct a Bureau-wide survey to identify those facilities that report under EPCRA and to obtain information on the use of toxic chemicals within BIA.
- In CY 2003, DECRM will analyze this information and identify potential toxic chemicals for targeted substitution and reduction.

- DECRM will report its results to the EMS and EPP Procurement Workgroups.
- Based upon direction from the Workgroups, DECRM will develop and issue field guidance on the reduction of these targeted substances, if any.

- Conformance with this field guidance will be monitored through the BIA EMAP and green procurement data calls to be developed.

Section 503: No progress report is required for this section because Interagency Workgroup has not produced the list of chemicals called for in Section 503(b). However, the BIA is proactively developing programs to address this requirement. See response to Section 502 above for information on BIA program to identify and target reductions in toxic chemicals at BIA facilities.

Section 505: Description of 2001 efforts to reduce and manage the use of ozone depleting

substances (ODS) at Federal facilities, including plan to phase out acquisition of Class I Ozone Depleting Substances (ODSs) by 12/31/10:

The BIA EMAP includes a protocol titled "Air Quality Management" that includes criteria related to ODS management. Field station use of Class I ODSs and plans to phase out these chemicals are noted during EMAP audits using this protocol. Recommendations to replace or retrofit Class I ODS systems are provided on a facility-by-facility basis. All facilities will receive baseline audits by 2010 and will have established retrofit and replacement plans if Class I ODSs were found.

Responses to Interagency Environmental Leadership Workgroup questions:

1. Agency EMS Policy.

- Has BIA top management signed and issues an agency EMS policy?
- If so, please describe the scope and content of the policy and describe actions taken within your agency to ensure that the policy is well communicated at all levels of the agency.
- If the policy has been made publicly available, please describe those actions.
- If you have not previously provided a copy, please attach a copy of the policy (or identify a publicly available web site).

DECRM is currently revising and updating Chapter 59 of the Indian Affairs Manual (IAM) regarding environmental management. The revised IAM chapter will include information on the BIA environmental management audit program and will endorse the development and implementation of EMS's. This policy will be promulgated in accordance with DOI Policy 515 DM 4, which states that Bureaus must develop an environmental policy, including EMS, by December 31, 2003. The revised policies will be announced through a memorandum from the Assistant Secretary as a further demonstration of upper management support.

Identification of "appropriate facilities" for EMS implementation.

- Please discuss the status of your agency's actions to determine which of its facilities are "appropriate" for EMS implementation including any process and criteria you have employed to make this determination.
- Please provide any current working estimate of the number of "appropriate" facilities in your agency.

The BIA is uniquely organized at the "facility" level. BIA managed facilities are organized by an "Agency". An agency consists of multiple buildings and operations that may include administrative offices, roads, irrigation, forestry shops and others. These facilities may be grouped at one location or may be spread among multiple locations. A Superintendent

administers the BIA agencies. The Office of Indian Education Program (OIEP) is responsible for management of all BIA education functions. These schools are organized by field offices and managed by Education Line Officers (ELOs). The field office may roughly correspond to a BIA Agency. Although the Agency and the schools may share some services, they generally are operated autonomously. Law Enforcement facilities (e.g., police stations, detention centers) are managed under the Office of Law Enforcement Services. These facilities are organized by districts and are managed by a Chief of Police. Facility management for these facilities may be provided by the Agency.

BIA facilities and operations including agency, OIEP and Law Enforcement facilities may be operated under a contract, grant or compact by a Tribe.

The current strategy is to implement EMSs at "appropriate" agencies and school location. The BIA will utilize the Bureau-wide FMIS to obtain information on the size (e.g., number of buildings), complexity (e.g., range of operations), and operational responsibility (i.e., BIA or tribe) of agencies and schools. Specific threshold criteria and ranking for each of these indicators will be established by DECRM and approved by the BIA EMS workgroup. The maximum number of EMSs, based on these criteria would be the number of agencies plus the number of educational facilities. However, it is anticipated that the size and complexity and operational responsibility of over a third of these "facilities" will not warrant a formal EMS.

It should be noted, although a formal EMS may not be warranted at all BIA agencies and schools, the BIA EMAP protocol on EMS includes an assessment of EMS elements at all locations and the development of recommendations for the institution of EMS elements where appropriate.

It should also be noted that the BIA recognizes that EMS principles are valuable at the regional and headquarters level. Opportunities to enhance and document the EMSs will be explored at these organizational levels as well as at the "facility" level.

Identification of resources (e.g., dollars, staff) for EMS implementation, for inclusion in budget request.

- Has your agency identified the resources needed to implement an EMS?
- If so, please describe your approach for estimating EMS implementation requirements for your agency.
- Please explain how your agency plans to fund EMS implementation.
- Please describe any obstacles you have encountered in obtaining funds for EMS.

As part of its efforts to oversee BIA's environmental initiatives, DECRM develops and manages the environmental program budget, which includes funds specifically designated for EMS project implementation. In FY 2002, $9.8 million was budgeted for DECRM. In FY 2003, $9.5

million was budgeted. Although a variety of activities planned for 2003 support the BIA's overall EMS implementation strategy, approximately $100,000 including contractor support, BIA staff time and travel is specifically dedicated to EMS tasks such as Workgroup meetings, field gap assessments and pilot projects, and tools development for the BIA in CY 2003.

Regarding personnel resources, an individual within DECRM has been assigned responsibility to oversee EMS implementation at the BIA. EMS activities are however, supported by a much broader group. The EMS addresses all the activities within DECRM. Over the past two years, BIA has increased headquarters environmental staff by about 20%, which has resulted in increased environmental support, such as compliance assistance, to field staff. At the regional and facility level, no new staff are anticipated specifically to implement EMS although it is possible that new staff may be added to address environmental management based on decisions by regional and facility managers. To implement EMS at these levels, EMS responsibilities will be integrated into existing staff roles and responsibilities at the regional and "facility" level. Additional staff is not anticipated.

Guidance for implementing EMS at your agency:

- Please describe any guidance identified or prepared for EMS implementation at your agency's facilities or organizations.
- If you selected or used a standard or "off the shelf" EMS implementation resource, please provide relevant reference or contact information.
- If your agency developed internal guidance, please provide a copy, a brief description, or a web site that can be shared with other Federal agencies.

DECRM recently developed an EMS fact sheet that have been distributed to RESs and other key BIA personnel to provide an overview of EMS concepts and elements, E.O. 13148, and the BIA's efforts relating to EMS. An audit protocol on EMS has also been developed as part of the BIA EMAP. Copies of the fact sheet and EMS protocol are attached.

A draft model "facility" level Environmental Management Plan has been prepared for agencies and school districts. The model provides a template for facilities to document their EMS. The model will be evaluated and approved by the BIA EMS Workgroup. Upon approval it will be shared with the DOI OEPC. Other guidance materials such are anticipated but have not yet been identified.

EMS training for senior-level managers:

- Please describe any EMS awareness or implementation training provided or planned for senior-level managers at your agency.
- If your agency elected to use a training resource, please provide relevant reference or contact information.

- If your agency developed internal training materials, please provide a copy, a brief description, or a web site.

Environmental management training provided to senior managers at BIA to date has included the BIA's Facility Manager's Conference and OIEP Facilities Management Workshop. As part of its responsibilities, BIA's working group will explore and develop additional training modules and methods for presenting EMS information to senior-level managers.

Program to conduct facility environmental compliance audits.

- Please describe your agency's overall approach to facilitate an effective environmental compliance audit program at your agency's facilities.
- Please describe existing or planned efforts to incorporate your compliance audit program findings in your facilities' EMSs.

The BIA has implemented a comprehensive multimedia environmental management audit program (EMAP). A Bureau-wide EMAP Workgroup was formed in 2001 and provided guidance to DECRM on the development of this program. An auditing section of the IAM Chapter 59 regarding the EMAP has been drafted. It is anticipated that this policy will be promulgated in 2003. A Version I Program Guide and a Version I EMAP Operating Guide have been prepared. The Program Guide provides detailed information on how the EMAP is managed by the DECRM. The Operating Guide provides procedural requirements for auditors and audit protocols for environmental audits.

The EMAP provides for a tiered approach to conducting environmental audits. Audits involving a site visit are anticipated for most BIA facilities. To conserve BIA resources, the program also provides for the completion of "telephone" audits and exception procedures for facilities that have limited or no significant environmental issues, respectively.

In 2002, DECRM conducted internal auditors training and pilot environmental audits at two BIA agencies involving approximately a dozen facilities to test the EMAP protocols and procedures. In addition, between 1999 and 2000, multimedia environmental reviews were conducted by the USEPA through a Memorandum of Agreement at four BIA agencies. Audits at 10 agencies including more that 20 locations are planned for CY 2003. The EMAP is to be an ongoing program that will involve all BIA facilities with audits being conducted at agencies at least once every five years.

The BIA is currently in the process of developing an EMAP module for integration into FMIS. This system will facilitate the conduct of audits, budgeting and tracking of corrective actions.

The BIA recognizes the EMAP as an integral part of its EMS. These audits provide a periodic, objective assessment of BIA facility operations relative to environmental performance. As such

EMAP audits will be a documented means of monitoring and measurement that will be incorporated into the BIA facility EMP. The audit corrective action, funding and tracking process is being built into FMIS so that it can be completely integrated into the BIA EMS accountability process. As such, environmental management will receives the same consideration as other facility corrective action and maintenance needs. The BIA believes that this approach to directly link the audit program into the BIA facility management systems is unique amongst the DOI bureaus.

Responses to confirm activity relating to various other sections of E.O. 13148, requiring action by agencies in 2002:

Section 305 (b) requires that agencies ensure that their facilities have prepared or updated a written plan regarding the facility's contribution to the goals and requirements established by the order. Agencies are requested to provide any available information regarding the status of facility plans.

As stated above, the BIA is implementing an EMS program that will provide for the preparation of EMPs at appropriate facilities. This program will be piloted in CY 2003. Sections of these facility plans will address how the facility sets annual environmental goals and targets as well as how they will monitor performance relative to these metrics. The Plan will include a description of the annual goals and targets that are set and annual progress reports. Facilities will be encouraged to develop goals and targets that make sense based on their operations. These goals and targets may include operational improvements (e.g., toxic substance reduction) and administrative improvements (e.g., develop new standard operating procedures) that support this and other Greening the Government E.O.'s.

DECRM will track facility progress in developing and implementing EMPs. BIA-wide progress in meeting goals such as toxics reduction and purchase of environmentally preferable products will be tracked through various programs developed by the EPP Procurement Workgroup.

Section 401 (b) requires each agency to implement environmental management systems through pilot projects at selected agency facilities. Agencies are requested to provide available information regarding the status of this requirement including any available list of such pilot facilities.

EMS pilots are underway at two BIA agencies, Papago and Pima. Additionally, BIA is participating in a pilot project with the Cherokee Tribe being conducted by the USEPA. Five additional pilot projects are planned for CY 2003. The EMS Workgroup will identify the specific sites for these pilot projects. The Workgroup will strive to select representative facilities based upon geographic location, size and complexity to gain the most information on what will work and not work on a BIA-wide basis. These complexities include multiple management responsibilities (e.g., Office of Indian Programs and Office of Indian Education Programs, Tribal contracting, leasing programs), unique regulatory environment (i.e., tribal requirements), field

level personnel and resource limitations, and varying complexity of operations (e.g., small agency operations to large electrical and irrigation projects). A key aspect of these projects will be the testing of a system that is simple, focused on making environmental management easier, not more complex for facility managers, and will include education and assistance components.

A list of the selected pilot project sites will be provided to the DOI OEPC once selected and approved.

Section 701 (b) required that each agency determine the feasibility of implementing centralized procurement and distribution programs at its facilities. Agencies are requested to describe whether such feasibility study was conducted and any relevant results or conclusions form the study. If the study was prepared in writing, please provide copies of the study.

As described in the overview above, an EPP Workgroup is being formed for the purpose of developing and implementing an integrated EPP Program for the BIA. The Workgroup will be led by representatives from DECRM and the BIA Division of Acquisition and Property Management (DAM). This workgroup will explore centralized purchasing as a strategy to improve EPP.

In addition**,** agencies are urged to use the report to address the general status of agency efforts to implement EMS at their facilities. In particular, success stories and experiences reflecting costs and benefits of EMS implementation at Federal facilities would be appreciated. Federal agencies are encouraged to use the report to provide additional information regarding success in addressing the goals of the order including consideration of life cycle concepts into facility and agency procurement. Finally, Federal agencies are encouraged to use the E.O. 13148 annual report as an opportunity to share information regarding agency environmental successes and challenges with their community and other interested parties.

The BIA is in the early stages of developing its EMS programs. At this time there are no environmental management success stories specifically linked to the BIA's EMS efforts. The BIA will monitor its efforts in CY 2003 and will be prepared to report successes and challenges in the 2003 EO 13148 Annual Report.

**BUREAU OF LAND MANAGEMENT**

Section 502. Reduction goals for releases of toxic chemicals as reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.

The Bureau of Land Management (BLM) reports its use of fire retardant, which is mixed on a batch basis as an aqueous solution and applied to wildland fires. The active constituent,

ammonium sulfate, contains the ammonium ion in a stable form. The fire retardant is used as intended and the amount "released to the environment" depends on the fire season. There are no viable substitute products at this time.

However, decreasing fire retardant use is expected to be a side benefit of the national fuels program. The need for fire retardant will decline as the federal government and its state partners reduce heavy fuel loads arising from past disruptions of natural fire cycles as well as other management practices. Applying a variety of fuel treatment types, such as mechanical thinning and controlled burning, will reduce the intensity and severity of wildland fires and restore health to fire-adapted ecosystems. The main focus is on wildland-urban interface areas where fire suppression is most critical and use of fire retardant has been extensive. Eliminating heavy fuel loads in wildland-urban interface areas will reduce the risks to communities and result in a corresponding decrease in fire retardant applications.

Section 505. Reduction and management of use of ozone depleting substances (ODS).

The BLM has been phasing out equipment containing ozone-depleting substances (e.g., air conditioners) and eliminating other ODS uses (e.g., solvents). In addition, technicians certified in the recovery and disposal of ozone depleting substances do equipment servicing and disposal. This is a routine business practice and part of standard operating procedures.

In 2002, BLM began a project to install a new humidification system at the Anasazi Heritage Center in Colorado. Located within the Canyons of the Ancients National Monument, the Anasazi Heritage Center is an interpretive and cultural resource facility with permanent and temporary exhibits, collections storage, conservation and research laboratories, and a library, theater and bookstore. Priceless Native American artifacts are stored and displayed at the facility. The Center preserves approximately 2 million artifacts and records for current and future researchers and historians. The project involves a new centralized air conditioning and heating system and ductwork and boiler. The chiller will utilize R-22, chlorodifluoromethane, and the most environmentally friendly refrigerant available for this application.

Section 305. Amended or updated policies, strategies, and plans.

The BLM's policy is to purchase environmentally preferable products. All service contracts include environmental preferability provisions. Green procurement policies, guidance, and case studies are posted on BLM's Acquisition Internal Homepage.

The vast majority of the BLM's office space is in commercially leased buildings and BLM's goal is to be a leader in greening space leases. Among other provisions, BLM's new lease agreements require energy efficiency, water conservation, recycling, and green cleaning in leased spaces.

The BLM has also instituted a Five-Year Space Leasing Program, which requires all states to submit a space reduction and collocation plan for all leased facilities. The goal of the plan is to reduce space in each facility to 200 square feet per person, thereby reducing the environmental effects of building new facilities and use of natural resources for building projects. Also, BLM will more efficiently manage the facilities in accordance with the aforementioned environmentally preferable provisions. The Five-Year Space Plan will not only reduce space but also reduce leasing costs, allowing BLM to utilize its savings for other greening efforts.

Section 401. Environmental Management Systems.

A formal EMS is currently being developed. Meanwhile, the BLM has already adopted a number of EMS elements. For example, BLM's Compliance Assessment Safety, Health, and Environment (CASHE) Program incorporates root cause analysis of CASHE findings of noncompliance. Findings, root causes, and corrective actions are tracked, used to identify systemic problems, and evaluated against performance measures.

In addition, BLM offers a curriculum of in-house environmental compliance and hazardous materials management training for technical specialists and managers. One course in particular, *Managers Guide to Environmental Compliance and Pollution Prevention*, prepares managers to fulfill their legal responsibilities for environmental compliance and protection. It covers discretionary and nondiscretionary actions, institutional controls, risk management, and reducing liabilities.

Section 402. Regulatory compliance auditing program.

The BLM instituted its Compliance Assessment Safety Health, and the Environment (CASHE) Program in 1993. The purpose is to evaluate all BLM facilities and operations in order to: 1) identify compliance issues and policy and training needs; 2) increase safety, health, and environmental awareness of all employees; 3) expand ownership for compliance by promoting implementation of collaborative solutions; and 4) facilities budgeting for the implementation of those solutions. Specific benefits include: 1) improved protection of the public's and employees' safety and health; 2) prevention of environmental damage and accidents and potential savings of thousands of dollars in environmental restoration or worker's compensation costs; 3) enhanced opportunities for training personnel in environmental and hazardous material safety and health issues specific to BLM facilities and operations; and, 4) improved transfer of environmental and hazardous material safety and health information and technology to the field.

Baseline CASHE audits have been completed at every field office and major facilities in BLM. Follow-up CASHE audits are currently conducted on a three-year cycle. The scope of CASHE audits was expanded in 2001 to include all occupational safety and health regulations and applicable nationally recognized standards related to facility compliance. This comprehensive scope helps to ensure BLM Field Offices are complying with the regulation or standard that is

most protective of human health and the environment. As a result, environmental regulatory exemptions that allow facilities to avoid being subject to a particular regulation are generally not applicable because the corresponding safety regulation or nationally recognized standard generally do not have such expectations.

The BLM requires its field offices to update the status of their CASHE findings annually. This update is used to identify policy and funding requirements and has led to BLM allocating a portion of its Deferred Maintenance funding specifically for facility compliance. The Bureau's Annual Performance Plan includes a long-term goal to improve the safety, health, and environmental condition of its organizational units. Follow-up CASHE audits and the implementation of CASHE recommendations by the field provide the basis for measuring and reporting progress under that goal. A pilot electronic document management system to automate the documentation of facility compliance findings and track their completion is under development.

Section 601. Environmentally and economically beneficial landscape practices.

In BLM, the use of native plants, and water conservation are routine land management practices. This is also known as "Xeriscaping." Opportunities to apply environmentally and economically beneficial landscaping techniques are extensive. They range from Xeriscaping demonstration plots at offices and recreation sites to testing native vegetative covers on closed landfills and abandoned mine tailings.

The BLM's FY 2002 appropriation for new construction funded five projects that include extensive landscaping. Four visitor centers and one recreation site are located in four drought-stricken, western states. All five projects will incorporate environmentally beneficial and fire resistant landscaping.

Landscaping was also a significant part of BLM's deferred maintenance work in FY 2002. Projects included campground and recreation site improvements, rehabilitation of trails and trailheads, and road reconstruction. They incorporated native, drought-resistant plants and Xeriscaping. For example, reseeding along reconstructed roads in western Oregon will halt erosion and sedimentation of creeks, streams, and other anadromous fish habitats. Erosion and sedimentation cause turbidity, which degrades water quality and adversely impacts spawning salmon and other threatened or endanger species.

Section 701. Roles and responsibilities of procurement officials and acquisition program managers.

The BLM's policy is to purchase environmentally preferable products. All service contracts include environmental preferability provisions. Procurement personnel have developed standard language and make sure that the appropriate green provisions are in all purchase agreements and

contract documents. However, procurement personnel do not do all purchasing. Employees make most small purchases with government bankcards and it is their responsibility to select green products. The Green Procurement icon on BLM's Acquisition Internal Homepage opens extensive information about environmentally preferable purchasing, including a Power Point presentation, product information, and case studies. The product information specifically identifies Comprehensive Procurement Guideline items that BLM routinely purchases and gives vendor and ordering information.

In 2002 the BLM hosted a Procurement Conference in which over 120 purchasing agents and contracting officers within the Bureau attended. During this conference two training sessions took place where the topic of "green procurement" was specifically covered. Topics included overview of E.O. 13101 and other policy requirements, the Department of the Interior Greening Strategic and Action Plans, Reporting Requirements, BLM's On-Line Purchase Card training concerning Green Purchasing, Best Practices within the Bureau were presented and discussed, and a "hands-on" presentation and class discussions of individual green products took place.

**BUREAU OF RECLAMATION**

The following information describes the Bureau of Reclamation's (BOR's) specific progress in complying with the applicable sections of Executive Order 13148, *"Greening the Government Through Leadership in Environmental Management."*

Sec. 202. Environmental Compliance. BOR complies with environmental regulations and has established and implemented environmental compliance audit programs and policies that emphasize compliance and pollution prevention.

Sec. 203. Right-to-Know and Pollution Prevention. BOR facilities inform employees and local response teams of possible sources of pollution resulting from facility operations. BOR facilities strive to reduce or eliminate harm to human health and the environment from releases of pollutants. Whenever feasible and cost-effective, pollution is prevented or reduced at the source. Many of the dams and power plants conduct emergency response exercises on a recurring basis that involve local fire departments having access to Reclamation facilities.

Most of the waste generated by BOR facilities is used oil. Standing policy dictates that used oil is recycled. Where a facility manages a fleet of vehicles onsite, that facility is encouraged to service the fleet with re-refined oil and re-processed anti-freeze. Many facilities use water-based solvents for parts cleaning, and tires are recycled on a regular basis. All but the front tires for the larger trucks are recapped.

Sec. 205. Use Reduction: Toxic Chemicals and Hazardous Substances and Other Pollutants. There are no radioactive wastes generated at BOR facilities. Facilities are regularly encouraged through the audit program to reduce the amount of chemicals purchased. They are also

encouraged to, when feasible, substitute products that do not contain harmful chemicals.

Sec. 206. Reductions in Ozone-Depleting Substances. Facility and office procurement and purchasing functions have established procedures to facilitate reduced purchasing of ozone-depleting substances.

Specific future challenges include R-12 and/or R-22 that is used in air conditioning systems throughout some regions, and bulk Halon used in most fire extinguishing systems in dam control rooms and large computer rooms. Those regions are evaluating environmentally friendly alternatives to these substances.

Sec. 207. Environmentally and Economically Beneficial Landscaping. Water conservation is a recurring theme in BOR planning. One of the most obvious ways to promote water conservation is through the use of native plant landscaping. Many BOR facilities practice "xeriscaping" and offer landscape assistance to water users. Water Conservation and Integrated Pest Management are robust and active programs within BOR that have resulted in policies encouraging environmentally and economically beneficial landscaping.

Currently, the Lower Colorado regional office is implementing an environmentally friendly and economically beneficial landscape plan by removing grassy areas in offices throughout the region and replacing it with rock. This plan will reduce the amount of water and chemicals used to maintain these areas.

Sec. 401. Facility Environmental Management System: The Lower Colorado Region is currently reviewing two EMS standards that might be implemented; these standards are ISO14001 and the Code of Environmental Principles. Many parts of an EMS are already in place throughout the agency, and offices are being looked at for potential pilot implementation.

Sec. 501. Toxic Release Inventor (TRI)/Pollution Prevention Act Reporting. Most regions (all except the Lower Colorado region) do not have facilities that meet the reporting requirements of Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA). The only BOR facility to meet the requirement is the Yuma Desalting Plant (YDP) and they are in full compliance with the act. YDP, while currently in standby mode and not meeting Section 313 reporting requirements, is in the process of making themselves ready to go into full production. This process involves detailed review of policy, procedures, and permitting, including TRI and EPCRA requirements. Although the overwhelming majority of BOR offices do not trigger EPCRA as a requirement, this agency nevertheless coordinates with the local response resources and communities at most of our offices, especially those that directly affect water supplies for irrigation districts and western population centers.

Sec. 502. Release Reduction: Toxic Chemicals. Chlorine is used in many of the water purification systems throughout Reclamation and alternatives to replace the use of chlorine in these systems are always being evaluated.

Sec. 504. Emergency Planning and Reporting Responsibilities. All area offices have Spill Prevention Countermeasure and Control Plans (SPCCs) in place, where applicable. There are some facilities that maintain SPCCs even though the amounts of petroleum products onsite are well below the threshold requiring an SPCC. Each SPCC includes a strong contingency plan. Each area office also has emergency drills for different scenarios such as, terrorism, oil spill, earthquake, and fire, to name the more common types.

BOR facilities comply with the provisions set forth in sections 301 through 312 of EPCRA, including development of SPCCs where required, development of emergency action plans and coordination with local emergency planning committees and emergency responders including fire departments and local law enforcement.

Sec. 505. Reductions in Ozone-Depleting Substances. All offices purchase products through the GSA catalog, which supplies products that comply with EO 13148. When a product is not available through GSA, employees are reminded to use products that do not contain ozone-depleting substances.

Sec. 701. Limiting Procurement of Toxic Chemicals, Hazardous Substances, and Other Pollutants. BOR procurement offices have guidelines in place that must be followed. These guidelines comply with EO 13148.

The following are BOR responses to specific questions proposed by the Interagency Environmental Leadership Workgroup.

Agency EMS (Environmental Management Systems) Policy .

- Has your agency top management signed and issued an agency EMS policy?

  The EMS Policy Statement should be finalized by the end of calendar year 2003. At the time of this report, a draft statement is being developed and expected out for review and concurrence from the regional directors by May 31, 2003.

- If so, please describe the scope and content of the policy and describe actions taken within your agency to ensure that the policy is well communicated at all levels of the agency.

  The draft will be sent out for review to the regional Hazmat Coordinators. Coordinators will be asked to solicit regional director comments as well. Once reviewed and commented on at the staff level, comments will be incorporated into the draft and then the revised draft will be sent to the regional directors for concurrence. Upon concurrence it will be sent for signature by the Commissioner and once signed will be posted on the BOR website and e-mailed throughout the

agency.

- If the policy has been made publicly available, please describe those actions.

  To date, an EMS Policy Statement is not in place. However, as described above, it is envisioned that it will be made available to the public via Internet access.

- If you have not previously provided a copy, please attach a copy of the policy (or identify a publicly available web-site).

  No official copy will be made available until the policy is finalized. However, draft language could be made available to interested parties.

Identification of "appropriate facilities" for EMS implementation.

- Please discuss the status of your agency's actions to determine which of its facilities are "appropriate" for EMS implementation including any process and criteria you have employed to make this determination.

  To date, the definition of facility, for BOR Hazmat purposes, has been a regional application of definition found in the Federal Facility Compliance Act. Because each region is unique in many respects it is difficult in the extreme to arrive at a single definition that is useful and practical throughout the agency. However, because of the reporting requirements of EO 13148, and recognized limitations in the existing audit program, a database of BOR facilities is being developed to address current and future requirements. The database is scheduled to be in place and current in spring of 2004. The selection criteria to determine EMS appropriateness will be made on the information available in the database.

- Please provide any current working estimate of the number of "appropriate facilities" in your agency.

  At this point there is no estimate available that will not be significantly revised over the next year.

Identification of resources (e.g., dollars, staff) for EMS implementation for inclusion in budget request.

- Has your agency identified the resources needed to implement EMS?

  Resources have been identified to develop expertise, initiate EMS implementation, and fulfill the requirements of DM 515.4. Estimates for complete implementation throughout the agency are not available at this time.

We recognize that cost of implementation is a critical factor and we are developing and contracting the expertise necessary to identify those costs.

- If so, please describe your approach for estimating EMS implementation requirements for your agency.

  The approach will be determined based on the response and comments we get from regional, area, and field offices. Given the broad spectrum of operations BOR is responsible for, from stream monitoring to Grand Coulee Dam, estimates will most likely be facility driven. We do expect similarities from some facilities that will be applicable on a broad scale. Such facilities include dams, power generation and irrigation systems.

- Please explain how your agency plans to fund EMS implementation.

  BOR is realigning staff functions to accommodate EMS implementation.

- Please describe any obstacles you have encountered in obtaining funds for EMS.

  Funding for fiscal year 2003 will allow us to meet with DOI requirements for preparation of a policy and strategy for implementation of EMS objectives. EMS implementation in 2004 or 2005 will be accomplished through staff realignment and projected funds. Budgeting requests for fiscal year 2006 are being developed.

<u>Guidance for implementing EMS at your agency.</u>

- Please describe any guidance identified or prepared for EMS implementation at your agency's facilities or organizations.

  To date there is no BOR guidance in place for EMS implementation. BOR Directive and Standard ENV 02-08 (audit processes) is in the process of being revised to support EMS and separate Directives and Standards (D&S) will be developed to specifically address BOR EMS implementation.

- If you selected or used a standard or "off the shelf" EMS implementation resource, please provide relevant reference or contact information.

  No standard has been selected for use throughout the agency. It is envisioned that facilities and offices will be encouraged to choose which standard they feel is most appropriate to their operation.

- If your agency developed internal guidance, please provide a copy, a brief description, or a web site that can be shared with other Federal agencies.

As with the EMS policy statement, such guidance is being developed. As it stabilizes via the review process it will have the same availability.

EMS training for senior-level managers.

- Please describe any EMS awareness or implementation training provided or planned for senior-level managers at your agency.

  A contract has been awarded to develop training for both senior level and office level management. Two versions are currently planned to cover awareness training and implementation training. Development of fact sheets and briefings discussing the same two areas is also called for.

- If your agency elected to use a training resource, please provide relevant reference or contact information.

  A contract has been awarded to PRIZIM Inc. to conduct initial training and establish a training program for EMS implementation in BOR. Further training will be conducted internally.

- If your agency developed internal training materials, please provide a copy, a brief description, or a web site.

  To be developed as part of contract discussed above.

Program to conduct facility environmental compliance audits.

- Please describe your agency's overall approach to facilitate an effective environmental compliance audit program at your agency's facilities.

  The BOR has D&S ENV 02-08 that addresses the BOR compliance audit program. It has been in place since 1996 and gives audit protocol and guidance. The program provides for conducting baseline audits of all Reclamation facilities, which are reasonably expected to purchase, use, store, treat, or dispose of hazardous materials/wastes through the course of their normal activities. Audits are conducted to determine facility compliance with applicable Federal, state and local rules, regulations and standards. The audit reports consist of a summary of findings based on the completed checklists applicable to the facility, including any necessary follow-up actions, and a transmittal letter or memorandum to the facility manager. An annual report is prepared and summarized to OEPC. Significant compliance issues and follow-up corrective actions identified in the audit report are tracked to monitor compliance. Recommendations and areas of

concern may also be discussed in the audit report; however, these issues will not be tracked and will not require a follow-up audit.

- Please describe existing or planned efforts to incorporate your compliance audit program findings into your facilities' EMS.

  To date there is no BOR guidance in place for EMS implementation. BOR D&S ENV 02-08 (audit processes) is in the process of being revised to support EMS and a separate D&S will be developed to specifically address BOR EMS implementation.

**FISH AND WILDLIFE SERVICE**

Section 502: Reduction Goals for Releases of Toxic Chemicals as Reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.

There are no Fish and Wildlife (Service) facilities that report releases of toxic chemicals under Emergency Planning and Community Right To Know Act (EPCRA) Section 313 provisions. Consequently no baseline has been established.

Section 505: Reduction and Management of Use of Ozone Depleting Substances (ODS).

The FWS has published a Fish and Wildlife policy manual chapter, dated 12/26/02, Ozone Depleting Substances (ODS), providing guidance for phasing out the use of Class I ODS's. The Chapter spells out procedures to schedule phasing out equipment that uses Class I ODS's. A copy of the chapter is attached.
FWS EMS Policy:

- Has your agency top management signed and issued an agency EMS policy?

  Yes, a Service Director's Order No. 144, Greening the Service through Environmental Leadership was established May 7, 2002. Section 7 (a.(3)) directed the Service to implement an Environmental Management System (EMS) as directed by E.O. 13148. In addition, a Director's memo dated February 4, 2003, established the Services Environmental Management Commitment.

- If so, describe the scope and content of the policy and describe actions taken within your agency to ensure that the policy is well communicated at all levels of the agency.

  The Director's Order was e-mailed to all employees and sent to each Regional Office for distribution to all Service facilities. The scope of the Order can also be accessed through our website: http://policy.fws.gov/do144.html. Site visits to facilities through the

environmental auditing program and environmental management systems are used to verify that policy has been implemented. The Order addresses greening initiatives in the Service through:

1) Employee responsibilities;
2) Training, environmental audits, Environmental Management Systems, accountability through performance evaluations and awards;
3) Environmentally preferable procurement, contracting and designs;
4) Conservation planning;
5) Community outreach;
6) Energy Management;
7) Landscape Management;
8) Water and Wastewater Management; and
9) Solid and Hazardous Waste Management.

The FWS has experienced great success in environmental leadership and greening as evidenced in the book entitled Environmental Stewardship and Greening of the Government. This document is located on the Division of Engineering website at http://sii.fws.gov/r9eng/.

Identification of "appropriate facilities" for EMS Implementation.

- Please discuss the status of your agency's actions to determine which of its facilities are "appropriate" for EMS implementation including any process and criteria you have employed to make this determination.

  An assigned EMS committee representing all FWS Regions met and reviewed EPA policy. The committee reviewed field stations and selected "appropriate facilities" based on:
  - Size, complexity and impact on the environment;
  - Number of personnel at the field stations (10 or more ); and
  - Commitment of field station managers.

- Please provide any current working estimate of the number of "appropriate facilities" in your agency.

  The FWS has selected 70 appropriate facilities and will implement EMS over a three-year period (FYs 2003-2005) to meet the December 31, 2005, deadline established by E.O. 13148. In 2003, refuge complexes (multi-refuge systems) and large fish hatcheries have been targeted.

Identification of resources (dollars/staff) for EMS implementation for inclusion in budget

requests.

- Has your agency identified the resources needed to implement EMS?

  Yes, the FWS has committed time and funds to successfully implement EMS throughout the agency. A portion of the Division of Engineering annual budget and a specific line item in the construction account are used to address the direct financial needs associated with this program.

- If so, please describe your approach for estimating EMS implementation requirements for your agency and how your agency plans to fund EMS implementation.

  The EMS program was initiated at our national office (Division of Engineering, Environmental and Facility Compliance Branch) in Denver, Colorado. An implementation strategy was established to initiate Environmental Management Reviews (EMRs) at National, Regional and facility offices. Funding was then provided for four facility pilot EMS's. Each appropriate facility that has an EMS established is given $5,000 to assist them in getting their systems off the ground.

  For the next six years, funds have been requested for the implementation and maintenance of EMS's at appropriate facilities.

- Please describe any obstacles you have encountered in obtaining funds for EMS.

  No obstacles have been encountered.

Guidance for implementing EMS at your agency.

- Please describe any guidance identified or prepared for EMS implementation at your agency's facilities.

Beginning in August 2001, the Division of Engineering (DEN) interviewed supervisors and staff throughout the Washington Office. The process revealed strong support for EMS and a desire to improve existing environmental systems, policies and communication. During the first quarter of fiscal year 2002, the DEN completed Environmental Management Reviews (EMRs) in Regions 1-4 and visited fields stations including Ridgefield NWR, Little Salmon NFH, Sevilleta NWR, Mora NFH and Technology Center, Minnesota Valley NWR, LaCrosse Resource Center, Savannah NWR and Chattahoochee Forest NFH.

We discovered from the EMRs that Regional Offices and field stations have a strong commitment to the environment. The Regional Offices have effective recycling programs for items such as paper products and aluminum cans. Most field stations place high priority on

pollution prevention and green procurement. All employees interviewed are eager to learn more about developing sustainable environmental programs.

The EMRs revealed several areas of environmental stewardship that needed some improvement both at the Regional and the field levels:

- Guidance on greening programs;
- Communication on environmental initiatives;
- Training;
- Emergency response procedures for spills;
- Procedures for addressing regulatory requirements such as hazardous materials management; and
- Follow-up on numerous open audit findings.

EMS Implementation Strategy - Overall Approach

The FWS EMS implementation strategy contains three major components: planning and preparation, field implementation and implementation support. Each of these three major components has multiple sub-components, the exercise of which will provide appropriate technical, managerial, and administrative support. Figure 1 depicts the implementation strategy.

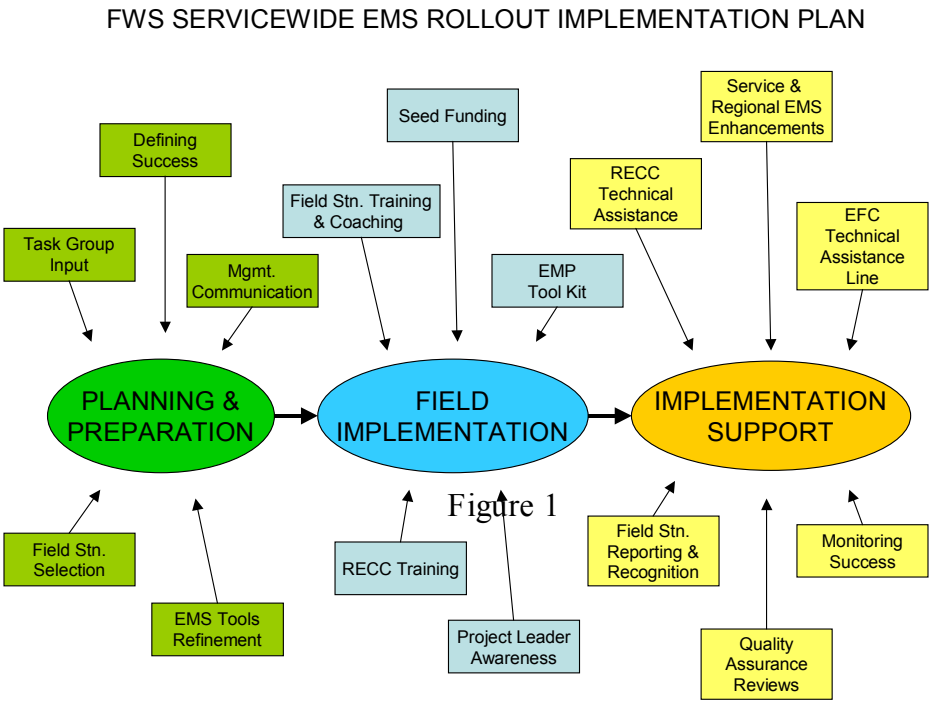


Figure 1

A strategy was established for EMS implementation. The implementation strategy focused on the development of an EMS at the field station level where FWS activities have the most direct and immediate impact on the environment. The FWS recognized that EMS benefits could be realized at all field stations, regardless of size and complexity, but that EMS development will focus on field stations that are larger and more complex and have the *greatest* environmental aspects and impacts. The FWS, therefore, concentrated on a select set of field stations (approximately 70). A team will implement the initial EMS for those field stations as was done with the pilot projects. The remaining smaller field stations may voluntary implement the program on their own but implementation will not be mandatory for them. The FWS also recognizes that Regional and Service-wide environmental management programs are necessary to effectively support field station efforts. Therefore the strategy addresses the strengthening of EMS at these levels as well.

The implementation strategy incorporates a comprehensive approach to EMS. Efforts will be managed and coordinated by DEN, but widespread commitment from many people within the FWS is required to ensure success; from awareness and communication, to training, monitoring and reporting within and between field stations, Regions, and Headquarters.

The FWS implementation schedule extends over three years. The schedule details implementation of EMS at the field station level by the Executive Order-specified deadline of December 31, 2005.

Stage One - Planning and Preparation

- Field Station Selection – EMS implementation will take place at approximately 70 field stations.

- Task Group Input – An implementation team was organized and will meet periodically to provide input on the EMS rollout strategy and process.

- Management Communication – The EMS strategy will be communicated to top management through briefings and other means to ensure their understanding of the program and to gain support for the project.

- EMS Tool Kit – An EMS tool kit has been developed for field station use. The principle components of the tool kit are the model Environmental Management Plans (EMPs). Other environmental management system related tools include model Standard Operating Procedures (SOPs) and other information such as Fact Sheets on specific subjects, projects, and related EMS requirements (i.e., greening initiatives). The tool kit will also evolve to include resources for general environmental program development, pollution prevention, model plans, and resource lists and other information requested by field stations to help them meet environmental goals and targets.

Stage Two - Field Implementation

Field Station Training and Coaching – Approximately 70 field stations will be visited for the purpose of providing hands-on assistance in the development of a field station EMS. This effort will involve the following:

- Training on what an EMS is, and how the EMP fits the program;
- Assistance in developing field station EMP and SOPs; and
- Other support as necessary to enable the field station to complete a draft site-specific EMP.

The roll-out schedule for this effort is based on the implementation of an EMS in at least 3 or 4 field stations per region per year; a total of approximately 20-23 stations per year. The expected time on site by the EMS Assistance Team is one week per site. Smaller field stations that want to voluntary implement the program on their own will be provide kits upon request.
Regional Environmental Compliance Coordinator Training – Regional Environmental Compliance Coordinators (RECCs) have been trained on EMS concepts, field station EMS technical assistance, and regional EMS improvement. This training helps the RECCs understand the Service-wide EMS approach, provides guidance on how to offer technical assistance to field stations, and specifies how they can lead the development of the regional EMP.

Project Leader Awareness – Management support and understanding is required for the EMS to not only to be implemented in the first place, but also to flourish. Opportunities will be identified to offer EMS training to project leaders and others at field station and also at appropriate centralized meetings and/or conferences.

Stage Three - Implementation Support

Service and Regional EMS Enhancements – A range of EMS improvements were identified during the EMS gap analyses. Some of these are necessary to support the efforts at the field station level. Others are Service and Region environmental management enhancements. Activities to enhance the Regional and Service EMS will include:

- DEN support to the RECC in the development of a Region-specific EMP; and
- Development of EMS components at Region and Service levels.

RECC Technical Assistance – Field stations and Regions will require technical assistance in order to continue EMS development activities beyond the site visit effort. The RECC is the primary “front-line” environmental technical assistance source for field stations. This role should now include EMS development activities.

Field Station Reporting and Recognition – Some data may be collected from field stations on their EMS progress, especially the data required by DOI and EPA. The DOI web site will assist in this reporting. This reporting will serve to:

- Help field stations continue to keep EMS activities active;
- Collect information on EMS successes; and
- Identify areas where more assistance is required.

A program to share EMS implementation data will be developed so that lessons learned can be shared across the organization. Either web postings or e-mails will be used for communication for those implementing the program.

Monitoring Success – Implementation of the EMS will be monitored. Summary reports will be prepared to describe program maturation. In obtaining and using such data, DEN can tailor support of the field station implementation effort, and the overall implementation strategy can be kept relevant to the needs of field stations and regions.

Quality Assurance Reviews – Tools will be developed to assess the quality of information gathered from field stations. Such information will be disseminated to other field stations. Measures will be in place to ensure the quality of data provided to other parties. Any self-assessment tool developed for use by field stations in gathering information will be both user-friendly and robust. This will ensure a standardized and comprehensive analysis of EMS activity.

Environmental Awards

Consistent with EMS policy, the DEN developed an annual Environmental Leadership Award for the Service. This awards program consists of both individual and facility awards in the same categories as the Department of the Interior environmental awards program. In 2002, the "Outstanding Refuge/Hatchery of the Year" awards for Environmental Leadership went to the Buenos Aires NWR and the Little White Salmon/Willard NFH Complex. Four Service award winners were also selected at the DOI level for FY 2002. Plaques and trophies are given to selected Service individuals and facilities.

- If you selected or used a standard or "off-the-shelf" EMS implementation resource, please provide relevant references or contact information.

  The Service used the EPA Code of Environmental Management Principals for Federal Agencies (CEMP).

EMS Training for Senior Level Managers

- Please describe any EMS awareness or implementation training provided or planned for senior level managers at your agency.

Senior level Managers in Washington, D.C. and Regional Offices were interviewed and educated about EMS and its planned implementation. In addition, Regional Environmental Compliance Coordinators have briefed senior staff at various Regional meetings.

- If your agency elected to use a training resource, please provide relevant reference or contact information.

  No training resource used.

- If your agency developed internal training materials, please provide a copy, a brief description, or web site.

  An independent contractor, PRIZIM, INC, provided training.

Program to Conduct Facility Environmental Compliance Audits.

- Please describe your agency's overall approach to facilitate an effective environmental compliance audit program at your agency's facilities.

  The FWS initiated a comprehensive environmental compliance auditing program in 1994. The DEN started the program with publication of state and federal handbooks for auditor use in the field. The DEN developed a sustainable program by training and certifying Regional personnel to accomplish the audits while maintaining central control over an audit database, training, and distribution of funding. During 2002, the Service completed a full cycle of audits at all facilities. The FWS has also assisted other Bureaus in setting up mandatory compliance auditing programs.

The FWS engages in certain operations and activities that could cause environmental impacts on public health and the environment. The purpose of the FWS Environmental Compliance Auditing Program is to:

- Establish FWS-wide standards and consistency for Regional environmental compliance audits as a means of ensuring that the FWS's compliance with all applicable environmental laws and regulations;

- Assure the FWS Directorate and environmental program managers that environmental programs are effectively addressing issues that could:

  - Impact FWS mission effectiveness
  - Jeopardize the health of FWS personnel or the public
  - Degrade the environment
  - Expose the FWS to avoidable financial liabilities as a result of noncompliance with environmental requirements
  - Erode public confidence

- Expose individuals to civil and criminal liability

- Maintain a record of outstanding and corrected environmental deficiencies; and

- Provide accurate information to develop budget priorities.

Scope:

The FWS has a wide range of field facilities that require audits. They include the following:

| | |
|---|---|
| Refuges | 540 |
| Hatcheries | 70 |
| Wetland Management Districts | 34 |
| Ecological Services Field Offices | 61 |
| Law Enforcement | 43 |
| Fisheries Research Facilities | 16 |
| Training Facility | 1 |
| Miscellaneous Field Offices | 96 |
| TOTAL: | 861 |

Procedures:

- Audits are conducted using Federal (updated annually) and State (updated every 2 years) handbooks. These handbooks list all state and federal compliance requirements in a matrix format that is easy for auditors to follow.

The handbooks are divided into 11 protocols:

- Air Emissions Management
- Drinking Water Management
- Hazardous Materials Management
- Hazardous Waste Management
- Pesticide Management
- Petroleum, Oils, and Lubricants (POL) Management
- Solid Waste Management
- Special Pollutants Management
- Underground Storage Tank (UST) Management
- Wastewater Management
- Greening

Audits are divided into 3 categories:

- Formal Audits. Formal audits are performed on all staffed facilities with maintenance facilities, fuel storage areas, laboratories and chemical storage areas. Formal audits

require a site visit to the Service facility to be evaluated. While on-site, the auditors conduct record searches, interviews and site surveys, to determine the compliance status of a facility. A team of two to three FWS trained individuals performs these audits. Additionally, auditors provide compliance training to field personnel while on-site.

- Informal Audits. Informal audits are utilized on facilities that are not staffed and have minimal operations, storage and maintenance activities. This is accomplished through a telephone conversation with the facility manager and by using a questionnaire and auditing handbooks.

- Self Audits. The FWS requires audits for all field facilities through the use of the Self Audit Questionnaire. Through the self-audit process, field stations perform an annual inspection to determine compliance with environmental laws and regulations. The purpose of a self-audit is to provide a quick evaluation of environmental issues during the period between formal and informal audits.

Types of Findings:

Audit findings are listed in five different categories as follows:

- Significant: A problem categorized as significant requires immediate attention. It poses, or has a high likelihood to pose, a direct and immediate threat to human health, safety, the environment, or the facility's mission.

- Major: A major deficiency requires action, but not necessarily immediate action. Major deficiencies may pose a threat to human health, safety, or the environment. Any immediate threat, however, must be categorized as significant.

- Minor: Minor deficiencies are usually administrative in nature, even though those findings might possibly result in a notice of violation. This category may also include temporary or occasional instances of noncompliance.

- Required Practice: Required Practice items are those derived from Service policy or Executive Orders. While not a federal or state regulatory requirement, compliance is still required.

- Management Practice: Management Practice items are those for which there is no specific regulatory requirement.

Quality Assurance/Quality Control (QA/QC):

In order to maintain consistency in the audit program, QA/QC evaluations are performed

internally by FWS as well as those performed by the U.S. Army Corps of Engineers.

Environmental Compliance Audit Tracking:

Audits and associated findings are tracked in the Environmental Facility Compliance Audit Tracking System (EFCATS). The EFCATS database is a user-friendly system that enables Service employees to input, edit and generate reports using Internet browser technology.

- Please describe existing or planned efforts to incorporate your compliance audit program findings into your facilities' EMS's.

  The FWS plans to incorporate an EMS protocol for our existing audit program after EMS has been implemented. We are presently performing our audits simultaneously with EMS site visits. A copy of the audit report is incorporated into the EMS report and is used to develop facility aspects and impacts and utilized to incorporate long-term solutions to compliance deficiencies.

- Section 305(b) requires that agencies ensure that their facilities have prepared or updated as appropriate, a written plan regarding the facility's contribution to the goals and requirements established in the order. Agencies are requested to provide any available information regarding the status of facility plans.

  The FWS is not planning to use separate facility plans to document accomplishments. Environmental Management Plans will be used to identify goals and monitor progress and accomplishments. The FWS has prepared plans for eight facilities at this time.
- Section 401(b) requires each agency to implement environmental management systems through pilot projects at selected agency facilities. Agencies are requested to provide available information regarding the status of this requirement including any available list of such pilot facilities.

  The FWS implemented Environmental Management Plans (EMPs) at 4 pilot sites including Charles M. Russell NWR, E.B. Forsythe NWR, Leavenworth NFH, and Ding Darling NWR. The Service also provided seed money to all the pilot facilities to accelerate the EMS implementation process. The EMS process was well received and will help the FWS formulate the program implementation FWS-wide. At the Charles M. Russell NWR, the purchase and use of biodiesel, antifreeze recycling equipment, 100% re-refined oil and alternative fuel vehicles, was recommended. Most of the recommendations have been implemented

  At the E.B. Forsythe and Ding Darling NWRs, the EMS team recommended the use of recycling containers, 100% re-refined oil, green-tip fluorescent bulbs, alternative fuel vehicles and interpretive exhibits for environmental programs.

At the Leavenworth NFH, the maintenance shop foreman, in partnership with the local U.S. Forest Service office, initiated a solid recycling program for shop wastes (oil and solvents). The team services their vehicles only at facilities that used re-refined oil. The recycling rate at Leavenworth was 46%, already meeting the DOI's goal of 45% by the year 2005.

- Section 701(b) requires that each agency determine the feasibility of implementing centralized procurement and distribution programs at its facilities. Agencies are requested to describe whether such feasibility study was conducted and any relevant results or conclusions from the study. If the study was prepared in writing, please provide copies of the study.

  No feasibility study has been done to evaluate centralized procurement, but through internal discussions, we feel that logistics and the small volumes of materials used by our facilities would prevent us from using centralized procurement.

**NATIONAL PARK SERVICE**

Section 502: Plans/goals to reduce release of toxic chemicals

NPS is currently developing Director's Order (DO) 30A: Management of Hazardous Materials, Solid and Hazardous Waste and Environmental Contamination, which underwent revisions in CY 2002 and will undergo further review in CY 2003. This DO requires parks to annually inventory specific hazardous chemicals and determine if there are environmentally preferable substitutes. It also encourages parks to reduce on-site inventories of hazardous chemicals and materials. Additionally, as part of its Environmental Audit Program (EAP), the NPS audits parks on their efforts to develop and implement an environmentally preferable purchasing program. These criteria include stipulations for reducing the purchase of toxic chemicals. Finally, NPS is developing guidance documents (EnviroFact Sheets and a generic Pollution Prevention plan) to assist parks in reducing and managing toxic chemicals. These documents are available to parks on the Park Facilities Management Division Intranet.

The NPS Concession Program has instituted specific procedures to help in reducing unnecessary use of toxic chemicals at NPS concession facilities. The Standard Concession Contract states that concessioners "shall submit to the Director, at least annually, an inventory of Occupational Safety and Health Administration (OSHA) designated hazardous chemicals used and stored in the Area by the Concessioner. The current Standard Concession Contract language states that the NPS Director must also first approve the use of extremely hazardous chemicals by concessioners. The Director may prohibit the use of any OSHA hazardous chemical by the Concessioner in operations under this contract." Concessioners are also encouraged to use environmentally preferable products in Concession Contracts and Operating and Maintenance

Plans and through the Concession Environmental Audit System (CEAS) administered by the Concession Environmental Management Program (CoEMP).

Section 503: Goals for the reduction in use of specified chemicals

Interagency Workgroup has yet to develop the list of chemicals; per Annual Report Guidance provided by the Department, no information is required at this time.

Section 505: Plans to reduce the use of Ozone Depleting Substances (ODS) and phase out acquisition of Class I ODS by 12/31/10

DO 30A states that all park facilities must phase out the use of Class I ODS by 12/31/10. Additionally, the EAP includes criteria relating to chlorofluorocarbon and halon management, encouraging parks to scale back their purchase and consumption of these substances. Because of this influence, several parks have been proactive in the removal of halon from park facilities, and others are taking steps to develop phase-out plans.

NPS primary use of ODS is for facility and vehicle air conditioning. Therefore, NPS would like to identify and acquire cost-effective ODS-free substitutes for its air conditioning needs. Unfortunately this is proving to be quite a challenge for the Service due to the lack of commercial availability of these substitutes. The Service is eagerly anticipating the increase in supply of ODS-free air conditioning units, and plans to incorporate them into its purchasing programs once they are available at a reasonable price.

Concessioners can be significant park users of ODS. These ODS are used in air conditioning and refrigeration equipment in lodges, restaurants and other visitor service facilities. Concessioners are encouraged to use less ODS through the CEAS and potentially through contract specifications and requirements.

EMS Components Agency EMS policy

The NPS is currently drafting DO 13: Environmental Management Systems to Establish Service EMS policy. This DO articulates the principles and priorities of NPS environmental management system development. Specifically, this DO outlines NPS policy for developing and implementing a facility-specific EMS that guides environmental decision-making and actions at all agency levels to ensure compliance with regulatory requirements and a commitment to pollution prevention, sustainable planning, and the use of environmental best management practices.

This DO provides overarching guidance for all other DO's, mandates, regulations, and other guidance that governs implementation of our environmental management responsibilities. This DO also provides a framework for other decisions that may involve environmental evaluations

where no stand-alone DO exists, such as procurement. This DO recognizes and supports actions that have taken place in parks and regional offices that have furthered development and implementation of environmental management systems and builds on the successful efforts to create a systematic approach to this issue.

This DO sets forth the policy and special delegations under which the NPS will develop and implement an EMS consistent with the requirements of the EO. Additional guidance on procedures and requirements will be developed in Reference Manual (RM) 13.

Additionally, part of the park's EMS program (described later in this document) is the development of an Environmental Commitment Statement (ECS). The Intermountain Region has developed a Regional ECS, and other regions and parks are expected to follow suit as they embrace the Service EMS program.

The CoEMP is responsible for operating in accordance with applicable environmental management requirements provided in DO 13. In addition, the NPS Concession Program is subject to specific policy requirements concerning environmental management contained in Concession Program Regulations (36 CFR Part 51, Standard Concession Contracts, May 4, 2000) and in the 2001 NPS Management Policies. Section 6 of the Standard Concession Contract requires all new concessioners to develop Environmental Management Programs (EMPs) and emphasize key elements consistent with standard environmental management system criteria.

Chapter 10 of the Management Policies, Commercial Visitor Services, includes a section titled "Environmental Program Requirements" that outlines NPS and concessioner requirements for environmental management related to commercial visitor services. The Management Policies state that concessioners must comply with applicable laws and incorporate best management practices. The Management Policies also provide further details about requirements to develop, document and implement, written EMPs (i.e., EMSs).

Identification of "appropriate facilities" for EMS implementation

Because NPS sees great value in EMS implementation for facilities of all types and sizes, headquarters determined that all facilities (i.e., parks) are appropriate facilities. Therefore, all parks will be encouraged to take advantage of the NPS EMS Toolkit, (currently under development and discussed in the "Guidance for implementing EMS" section of this report) and implement an EMS by the end of CY 2005.

Concessioners operate as contracted entities within the park and their management by the park will be accounted for and addressed in the park EMS. However, the NPS also requires, through the Standard Concession Contract and its Concession Management Policies that concessioners develop their own documented EMPs. The scope of the EMP may vary based on the type, size,

and number of concessioner activities. Concession Contracts can be grouped into three categories. Both Category I and II Concession Contracts have NPS buildings and property assigned to the concessioner. Category III Concession Contracts are those that do not have NPS buildings and property assigned to the concessioner and are, in general, smaller and less complex than Category I and II contracts. Because of their more limited operations, concessioners with Category III contracts are not required to develop and implement written EMPs, although certain environmental programs and requirements will likely be identified in the Contract.

Identification of resources for EMS implementation

To ensure adequate personnel resources for the development and implementation of a Service-wide EMS program, NPS has acquired contractor support. Additionally, an EMS Task Group composed of NPS headquarters and Regional staff has been formed to oversee Service-wide EMS efforts. The Task Group met twice in CY 2002, once at The Blue Ridge Parkway in June and again at Acadia National Park in September. The results of these meetings are described in the next section of this document.

Regarding financial resources, headquarters requested an additional $5 million for EMS development and implementation for FY 2004 through the NPS Greenbook Process. Additionally, NPS has integrated an EMS component into its EAP, allowing park EMS activity to be reviewed during audits. Because these reviews are part of the audit, they are financially supported by the EAP budget.

The NPS Concession Program has dedicated $600,000 for the operation of the CoEMP in CY 2003 to support the CoEMP in its mission to "provide assistance and guidance that advances the environmental performance of businesses offering visitor services in national parks". There is no dedicated portion of this budget exclusively targeting EMS as most of the CoEMP activities support the development of such systems for concessioners. The CoEMP staff includes two full-time staff, a full-time intern, and volunteer and environmental consultant support.

Guidance for implementing EMS

NPS has made significant progress in developing guidance for EMS implementation throughout the Service. As stated above, the EMS Task Group convened twice in CY 2002 to discuss the Service's EMS approach. The group assessed ISO 14001 standards and the Environmental Protection Agency's Code of Environmental Management Principles (CEMP). The Task Group felt that elements of both systems were relevant to parks and decided to develop a unique EMS program that borrowed from each approach and best addressed park needs: the NPS Model EMS.

From the Model EMS, NPS began to discuss and develop the EMS Toolkit, which provides step-by-step guidance for developing a park-level EMS. A draft of this Toolkit will be finalized and shared with pilot parks in CY 2003, and the final Toolkit will be completed and distributed

Service-wide in early CY 2004. The Task Group also began developing ideas for a sample EMS Manual and templates (which will be created in CY 2003) to accompany the Toolkit and assist parks in this process. These guidance documents will be designed to help parks create an EMS tailored to each park's unique set of activities, functions, and needs; but still provide for the Service-wide consistency desired by NPS leadership. NPS believes that this approach will result in the most effective EMS for each park. To provide additional support, NPS will offer a Help Desk/hotline and EMS web site to assist parks as they develop their EMS, once the program is rolled-out in CY 2004.

Concession operations, while an element of the larger park system, provide vastly different services and functions from parks. This required the development of a dedicated program to develop resources, training and tools on developing environmental management tools that are geared toward businesses operating in a natural resource setting. The Standard Concession Contract sets standards and required elements for concessioners to develop EMPs. To assist concessioners in developing these programs, the CoEMP drafted a general guidance document entitled, "Guideline for Developing a Documented Environmental Management Program." This Guideline is currently undergoing legal review. The CoEMP has also drafted service-specific environmental management guidance for bicycle, ferry, float trip, food, horse stable, lodging, and retail operations and services. These documents are also currently undergoing legal review. Guidance documents and will be developed for all service types.

EMS training for senior-level managers

NPS Park Facility Management Division team representatives gave a presentation to Deputy Regional Directors (DRDs) to inform them of current and planned Service EMS-related activities and the amount of resources that will be dedicated to these efforts moving forward. A similar presentation was also made to the Service Maintenance Advisory Committee (SMAC), which consists of Regional Chief Maintenance staff. NPS plans to keep senior-level management fully informed of the development of Service-wide EMS activities. In order to be cost-effective, it is likely that EMS training will be incorporated into existing senior-level manager training.

The CoEMP Team Leader has also briefed top managers on the CoEMP. In addition, training related to environmental management of concessioners was integrated into Concession Contract training for NPS concession chiefs and concession staff. An environmental management module is also being integrated into the new comprehensive hospitality management certification program developed in partnership with the Northern Arizona University School of Hospitality.

Section 402: Program to conduct facility environmental compliance audits

In CY 2002, NPS revised the "National Park Service Environmental Audit Program Auditor's Handbook" and began using this new version in June 2002. The handbook provides thorough instruction on planning, conducting, and following-up with environmental audits.

Comprehensive EAP Check Sheets that serve as the framework for conducting the audits were also revised in CY 2002. NPS leadership completed a baseline environmental audit for every park by October 2002 and will conduct routine (i.e., follow-up) audits for every park every three to five years. Routine audits will begin in CY 2003.

In order to capture and organize the results of these audits and make the information available to all relevant stakeholders, NPS developed an on-line database tracking system. This database was utilized in CY 2002 and will continue to operate in CY 2003 and beyond.

The CoEMP through the CEAS administers environmental audits of concessioners. To date, the CEAS has completed 57 site audits of concession operations. The CEAS is a part of the NPS EAP and uses the EAP Handbook as a basis, but is augmented with concessioner-specific criteria and procedures to address unique concessioner issues. A CEAS Operating Guide is currently under development and will be undergoing legal review and public comment in CY 2003.

Section 305 (b): Written plan regarding facilities' contribution to goals established by EO 13148

The NPS is addressing EO goals in several ways: pilot EMS program, reducing toxic chemicals and ODS, conducting environmental audits and developing green procurement guidance. However, there is no one centralized plan to incorporate these activities. The NPS feels that because these efforts are already successfully underway, it can most effectively address each topic using its current approach rather than consolidating or combining activities into one plan.

There is currently no program to directly assess concessioner performance relative to EO goals since concessioners are not legally required to comply with EO requirements. However, the CoEMP is monitoring corrective action progress on audits and tracks the completion of concessioner EMPs as they are developed under new Concession Contracts.

Section 401 (b): Pilot program

In order to promote the Model EMS and roll out the Service-specific EMS program, NPS developed a pilot study program and identified seven parks to serve as participants: Cape Cod National Seashore, Boston National Historic Park, Big Cypress National Preserve, Perry's Victory & International Peace Memorial, Glacier Bay National Park & Preserve, Padre Island National Seashore, and Prince William Forest Park. At the September Task Group meeting, these parks were strategically chosen for two reasons. First, they represent the breadth of park types: small and large, rural and urban. By selecting a mix of park types, the Task Group can test and ensure that the documents are relevant and helpful for all parks. Secondly, these parks had not previously undertaken any EMS activity. This is the case for the majority of parks, so the Task Group felt it was very important to determine if these documents could be effective for parks starting "from the ground up."

During the pilot study in CY 2003, these parks will develop their own EMS using the Toolkit and other documents and provide feedback to the Task Group. The Task Group will then revise the documents as necessary before rolling out the program Service-wide in early CY 2004. In addition to the pilot program, three "Pioneer Parks" began to pursue ISO 14001 certification in 2000. Their efforts continued into CY 2002.

The CoEMP did not conduct any pilot projects. However, upon request from parks, the CoEMP has reviewed draft EMPs prepared by concessioners to assess compliance with Standard Concession Contract requirements and overall quality. The CoEMP will revise guidance materials on how to prepare EMPs and may suggest administrative changes to the Standard Concession Contract specifications if opportunities for improvement are identified and to ensure consistency with the Final NPS EMS.

Section 701 (b): Centralized procurement

While NPS has not conducted a feasibility study of implementing a centralized procurement system, the Pacific West Region has developed a "How to Guide on Environmental Purchasing." Plans are underway to make this document applicable and available to all parks.

The CoEMP is developing concessioner specific Environmental Purchasing guidance. Concessioners have participated in environmental purchasing training conducted throughout the Pacific West Region.

## OFFICE OF SURFACE MINING

Although the Office of Surface Mining (OSM) does not own, operate, or maintain facilities subject to the requirements of EO 13148, we support Departmental efforts to develop sound environmental management systems (EMS). OSM is preparing an EMS Commitment Policy conveying overall EMS goals and priorities to senior management.
OSM actively promotes environmentally friendly practices under other Greening executive orders, including those governing procurement, recycling and waste prevention activities.
As a member of the Departmental planning group carrying out the mandates of EO 13101, OSM played a key role in developing the Strategic Plan for Greening the Department of the Interior through Waste Prevention, Recycling, and Federal Acquisition. Following the release of the Strategic Plan in May 2000, OSM actively worked with other Departmental bureaus and offices in preparing a detailed action plan describing the specific steps the Department to implement the Strategic Plan.

OSM serves on the DOI committee developing the second annual Memorandum of Understanding (MOU) with UNICOR – the trade name for the Federal Prison Industries. The MOU on Recycling and Reuse of Electronic and Automation Equipment supports both EO

13101 and EO 13148. The MOU provides the Department with environmentally safe alternatives to landfill disposal through recycling of surplus or obsolete electronic equipment. OSM also follows the guidelines for procurement of Alternative Fueled Vehicles and reduction of fossil fuel usage in support of EO 13149 – Greening the Government through Federal Fleet and Transportation Efficiency. Finally, for the past three years, OSM has participated in the transit subsidies program authorized under EO 13150 – Federal Workforce Transportation.

## U. S. GEOLOGICAL SURVEY

Section 305. Policies, Strategies, and Plans.

a. Prior to CY 2001, Environmental Policy within the U.S. Geological Survey (USGS) was limited in scope to primarily hazardous material and waste management functions. Realizing the need to address the full range of environmental requirements and standards, USGS Survey Manual (SM) 445-5-H, Environmental Management and Compliance Program Requirements Handbook was developed to mirror The Environmental Assessment Management (TEAM) Guide and was approved as USGS environmental policy in May 2002. In addition, the USGS 445.1 Survey Manual Chapter 445.1 - Occupational Safety, Health, and Environmental Policy and Responsibilities was amended to include environmental responsibilities along with the Department of the Interior/USGS Strategic Plan modified

b. It was identified during the baseline environmental compliance-auditing program that most of USGS facilities did not have written facility plans. The Safety and Environmental Management Branch (SEMB) developed a plan template to assist the facility personnel in completing the required plans.

c. In an effort to standardize and simplify the compliance auditing and management review process at all organizational levels, the USGS has entered into a joint effort with the U.S. Army Corps of Engineer Construction Engineer Research Laboratory (CERL) to develop a web-based tracking and auditing assistance program. Web-Based Compliance Assessment System (WEBCASS) is a unique program that enables personnel at all levels to access the tools necessary to comply with environmental compliance requirements, track compliance progress, generate compliance and management reports, and assist with tracking actual and projected corrective action funding. This system is a critical component of the USGS Environmental Management Systems.

   In FY 2002, the USGS developed and distributed a system overview on CD ROM to executive, field management, and collateral duty environmental program coordinators to create initial awareness and benefits of the system. In addition, the USGS through CERL, conducted formal hands-on-training for system users and administrators during

the second and third quarters of CY 2002. Although the system is being used by selected components of the USGS, full implementation is anticipated before the end of CY 2003.

Section 401. Agency and Facility Environmental Management Systems (EMS).

a. USGS EMS Policy:

1) The USGS Director has issued a policy statement as required by EMS in CY 2001 fully supporting the environmental program. The Director's Safety and Environmental Policy Statement was distributed electronically to all employees of the USGS.

2) USGS EMS requirements, and implementation guidance are incorporated into USGS environmental policy manual, SM 445-1-H Environmental Management and Compliance Program Requirements Handbook. The USGS Safety and Environmental Management Branch printed and distributed 1,000 copies of the environmental policy manual printed to the Regional Safety Managers for further distribution. Additionally, the environmental policy manual is posted on the USGS Intranet.

3) Program Management Checklists are developed and included in WEBCASS for self-assessment at each level of the organization. The SEMB conducted a management review of the Central Region Headquarters in CY 2002 with the Eastern Region Headquarters scheduled for review in CY 2003.

Identification of "appropriate facilities" for EMS implementation.

1) The USGS distributed a bureau wide environmental compliance questionnaire in FY 1999 to determine the scope and locations of baseline auditing activities based on high risk/high environmental activities, resulting in 35 locations undergoing formal baseline audits. The USGS has deemed these same 35 sites as "appropriate" for the scope of initial EMS implementation.

2) Extensive environmental questionnaires are included in WEBCASS requiring annual update. As the facilities complete these questionnaires, the information will be analyzed to determine the appropriateness of EMS implementation at smaller and low activity field locations. A copy of the questionnaire can be provided upon request.

b. Identification of resources (e.g., dollars, staff) for EMS implementation, for inclusion in budget request.

1) The following are resources expended in support of EMS:

a) $112.5K for FY 2003 WEBCASS upgrades for environmental aspects/impacts and EMS modules.

b) $314K for WEBCASS and environmental compliance audits in Eastern Region.

c) $157K for WEBCASS regional training sessions and operation/user manuals.

2) The USGS budgeted $50,000 for initial implementation for a pilot project program at seven sites. Resources will be completely identified based on the information gathered from the pilot project program. Currently the Bureau Environmental Program Manager is the only staff person identified for bureau wide EMS implementation.

3) An additional $50,000 has been requested for EMS implementation in the FY 2004 budget. These funds will be used to assist the Regional Environmental Protection Specialists in implementing EMS at facilities within their respective regions. In addition, the following items that fully support EMS implementation have been identified and requested in FY 2004:

a) $375K for addition of 3 regional Environmental Protection Specialist full-time employees.

b) $250K Waste Contamination Fund for Environmental Remediation.

c) $70K for WEBCASS upgrades, user manuals for environmental executives, supervisors, and employees.

c. Guidance for implementing EMS at your agency. The USGS has included EMS guidance in the environmental policy handbook. Additional implementation guidance will be provided after the pilot project program is established in FY 2003 and the lessons learned from implementing EMS at the pilot facilities is reviewed.

d. EMS training for senior-level managers.

1) A 1-hour formal EMS briefing and training session was provided to the USGS Executive Leadership Team on February 10, 2003. In addition, they received a CD ROM product that was mentioned earlier for WEBCASS implementation. Specific organizational management responsibilities are fully defined in the USGS 445.1 SM Chapter 445.1 - Occupational Safety, Health, and Environmental Policy and Responsibilities.

2) The USGS funded and is in the process of developing Web-based environmental training through the Department of the Interior University. The training will include separate courses for executives, supervisors, collateral environmental program

coordinators, and employees. It is estimated that these courses will be fully on line before the end of FY 2003 and will be made available to all other DOI bureaus.

Current efforts to integrate this effort with Office of Personnel Management initiatives training for all Federal agencies access and administration through the electronic government Website at http://www.golearn.gov. are being discussed in FY 2003. Should these efforts come to fruition, the intent is to coordinate with EPA for review of formal course content. The USGS FY 2003 cost is $100K.

e. Program to conduct facility environmental compliance audits.

1) The USGS also completed all baseline audits via CERL agreement that are incorporated within WEBCASS, with all field locations completing an annual assessment based on USGS program and compliance responsibilities and Federal TEAM Guide requirements.

2) The USGS SM 445-1-H, Environmental Compliance and Protection Handbook, requires internal audits to be conducted annually at each facility bureau wide. It further requires each region to conduct external audits at all facilities at least once every 4 years. Furthermore, the bureau SEMB is conducting management reviews at the Regional level at least once every 3 years.

3) Findings of all internal, external, regulatory agency inspections, and management reviews are loaded into WEBCASS. A corrective action plan is completed in WEBCASS and tracks all identified deficiencies and details associated funding through final corrective action(s). Local-level supervision is required to monitor and update corrective actions every 90 days until abatement is completed. Corrective action status reports are available to every level of supervision, including the Director's level for use in considering out year budget needs and potential for deferred maintenance projects.

4) The USGS has approved $50,000 to initially fund the Pilot Project Program. Location, facility size, discipline, and facility function were the criteria used to identify the pilot program sites listed below. With the exception of the Las Vegas Field Station, six of the seven locations had also completed formal environmental audits based on high risk/high environmental activities. A scope-of-work is in procurement for a contractor to assist with the development and implementation at the pilot project sites:

a) Georgia Water District Office, Atlanta, Georgia
b) Center for Coastal and Wetland Studies, St. Petersburg, Florida
c) EROS Data Center, Sioux Falls, South Dakota
d) Columbia Environmental Research Center, Columbia, MissouriNational Water

Quality Laboratory, Denver, ColoradoLas Vegas Field Station, Henderson, NevadaWestern Fisheries Research Center, Seattle, WashingtonSection 402. Facility Compliance Audits.

The USGS began to fully implement an environmental auditing program in CY 1999, identifying high-hazard facilities that posed the greatest environmental risk and subsequently scheduling formal audits of these locations to meet 515 departmental manual baseline audit requirements. Individual facility data collected was assessed based on the degree of risk and extent of environmental activities, resulting in the identification of 35 organizational components with 414 buildings that fall under formal baseline auditing requirements.

Section 502. Release Reduction: Toxic Chemicals.

a. In general, the USGS has taken a decentralized approach to managing the requirements of this section, with local level supervisors and managers responsible herein. Local efforts have resulted in unused chemicals destined for disposal or treatment at headquarters and regional facilities being offered to other organizations for use, resulting in waste reduction and disposal costs.

b. The USGS established a headquarters "Greening the Interior" working group to implement the departmental "Greening the Interior" Strategic Goals and participate on DOI "Greening" Committees, as appropriate. Membership of the working group includes representatives from the SEMB, Facilities Management, Procurement, and Property Management. Plans are underway to formalize this working group and establish 3 regional workgroups with similar functions represented to provide field guidance on Executive Order (EO) issues and implementation. Beginning in CY 2003, the USGS "Greening the Interior" Working Group, in concert with regional safety/environmental personnel, will begin to proactively develop a formalized bureau plan and identify additional economies of scale with respect to reducing toxic chemical quantities.

Section 505. Reductions in Ozone-Depleting Substances (ODS). A formal implementation plan has not been drafted, but information from the implementation of WEBCASS will be used to develop a realistic plan to meet the goal to phase out Class I ODS by December 31, 2010.

Section 601. Landscaping Management Practices: Implementation. Elements of the Guidance for Presidential Memorandum on Environmentally and Economically Beneficial Landscape Practices on Federal Landscaped Grounds have been incorporated into the USGS 441-H, Environmental Management and Compliance Program Requirements Handbook.

Section 701. Limiting Procurement of Toxic Chemicals, Hazardous Substances, and Other Pollutants. The USGS procurement officials are aware of the requirements of EO 13148 and are following them. Affirmative procurement programs are assessed during the environmental compliance audits and management reviews. This is an evolving program in the bureau and new initiatives will be studied and implemented appropriate. They have also substantially updated their internal Website as a useful tool to communicate executive order requirements to the field.

# APPENDIX

- DOI EMS Policy (515 DM 4)
- DOI EMS Council Charter (ECM03-02)
- DOI EMS Council Bureau and Office Contacts